

Introduction

This filing does not seek a monetary award. In light of <u>Chevron</u>, this complaint asks for a thorough review and relief from the conditions of <u>confinement</u> and Constitutional deprivations that are presented herein.

A confluence of issues have culminated into my inability to communicate as well as my inability to seek knowledge. I believe that I, and all other incarcerated persons, have a First Amendment right to certain activities, and third parties have expressed their desire and reciprocal right to receive my speech.

This complaint centers on unreasonable, arbitrary, and extreme restrictions regarding the use of the BOP typewriters and the use of the Inmate Trustfund Photocopy Machine. These egregious restrictions conflict with the First Amendment as well as specific BOP Program Statements that authorize all inmates to create, duplicate, and share original literary works, i.e., fiction, nonfiction, biographies, music scores & lyrics, religious texts, educational correspondence course work, hobby craft patterns, artworks, legal work, business correspondence, casual correspondence, etc.

During its review, I ask the Court to observe that the deprivations described herein, affect all 1,700 inmates at FCI-Seagoville as well as their family members, and all third parties who have any interests in the afore. Furthermore, due to the fact that the BOP South Central Regional Office and the BOP Central Office (D.C.) have upheld these deprivations by their responses to my exhaustion of the available grievance process, I ask the Court to further observe that these deprivations are potentially not limited to FCI-Seagoville, and can affect all BOP inmates, their family members, and interested third parties no matter where an inmate is located within the BOP.

Statement of Facts

- 1. I am incarcerated at FCI-Seagoville, a low security federal prison with approx. 1,700 inmates.
- 2. I am a writer by both trade and hobby, and enjoy expressing myself in a variety of ways to diverse audiences. For example, two notable publications of my work were published online by the Vanguard Incarcerated Press at Berkeley. (See Exhibit H -Literary Works, "BOP Offers Higher 'Degrees'" and "Paying For Much More Than Our Life's Mistakes")
- 3. I was informed by a staff member in May 2023 that the Supervisor of Education (SOE), Lauren Howard, had discovered one of these online articles and that she had had a negative reaction to the deprivations that my essay had publicly revealed.

- 4. I have a progressive physical ailment in my writing hand, which causes pain when attempting to grip a pen, and which affects the legibility of my handwriting when I must produce more than a minimal volume. (Exhibit A Medical Documents) Although this complaint pertains to the restriction on the use of the typewriters and Inmate Trustfund Photocopy Machine as applied to all inmates, the progressive medical condition in my writing hand is an additional element that is unique to me and others who have similar physical limitations.
- 5. I am able to type on a typewriter or keyboard, if permitted, as it does not involve gripping, and typing allows me to create highly legible and also lengthy documents when needed.
- 6. FCI-Seagoville has 23 visible Swintec® 7000 typewriters within the education building, of which, 11 are located in cubicle-style desks which are accessible for inmate use. There is also a specific but unknown number of unused typewriters in storage rooms within the education building.
- 7. I pay for the services of Webb Hunter, LLC, a service that specifically caters to the incarcerated. They assist me in online and AI research, among other services. I type to communicate with Webb Hunter, and they scan (OCR) my typed text for direct feed into various online and AI services. The OCR scan does not work with handwritten inquiries, which is critical because some of my AI inquiries are lengthy and sometimes require AI to analyze my work. (Case in point: I sent the typed text of this entire complaint to Webb Hunter in order to have AI analyze my work.) It is cost prohibitive for these services to manually type these inquiries into AI from my handwritten submissions notwithstanding the medical condition in my writing hand. (Exhibit D General Exhibits, Webb Hunter, LLC Invoice)
- 8. I want to use a typewriter to prepare a diverse array of <u>legal</u> documents, including, but not limited to: motions in this case; documents in support of compassionate release; prison release plans; FOIA requests; documents pertaining to my open U.S. Tax Court case; etc., all of which, I believe are authorized by 28 CFR §543.11(h) and BOP Program Statement §1315.07. (Exhibit B CFR & Program Statements)
- 9. I want to use a typewriter to compose a wide array of <u>nonlegal</u> manuscripts and correspondence including, but not limited to: communications necessary for educational course work; concerns with congressmen and senators; the filling out of governmental & non-governmental forms; essays & biographies; business & personal letters, all of which, I believe are authorized by BOP Program Statement §5350.27. (Exhibit B CFR & Program Statements)
- 10. It has been a quarter-century since the drafting of §1315.07 and §5350.277, and inmates have been able to freely use the typewriters and Inmate Trustfund Photocopy Machine to create and to duplicate the documents that are authorized within both program statements since then.
- 11. FCI-Seagoville does not have computers or tablets that offer word processing for inmate use.

- 12. The Inmate Trustfund Photocopy Machine is provided by the BOP Trustfund department for inmate use, and is funded by the sale of copy cards to inmates. Likewise, inmates must purchase typing & correction ribbons, albeit, at an exorbitant retail cost, for use with the typewriters.
- 13. SOE Lauren Howard was initially subordinate to the then-SOE, Ms. Caldwell, and was aware that there were authorized typewriters in all of the inmate housing units that allowed for the typing of all legal and nonlegal documents at all times. Ms. Howard was also aware that the Inmate Trustfund Photocopy Machine in the education building was openly available for inmates to copy both legal and nonlegal documents.
- 14. In late 2022, SOE Caldwell transferred and Ms. Howard became the Supervisor of Education, at which time she began to unilaterally create personal policies which conflict with the BOP national policies cited in #8 and #9 above.
- 15. A few months later, SOE Howard personally removed the typewriters from all of the housing units, effectively restricting all typing to the education building, which has limited, erratic, and inconsistant hours of operation with incessant closures. As the Inmate Trustfund Photocopy Machine is also located in the education building, these incessant closures and erratic hours limited access to the copy machine as well.
- 16. On 6/13/2023, SOE Howard posted a new notice that the typewriters would now be restricted to the creation of "legal work only", and that, "Any inmate using the typewriters in the law library for typing any material(s) other than legal paperwork may be subject to an incident report (Code 307)". This notice did not define what would be considered as "legal paperwork". (Exhibit C Public Postings)
- 17. To my knowledge, SOE Howard is not an attorney or paralegal, and does not have any training in legal matters.
- 18. I have nonlegal literary works, both completed and of which I would like to create in the future, and which I would like to copyright using the Library of Congress's U.S. Copyright Form TX, which specifies that I must submit "two complete copies of the 'best edition' of [my] work" along with a completed Form TX and payment. This instruction accompanies the copyright application form and is also covered under the "Mandatory Deposit" provision [which refers to the work, not monetary] of the copyright process instructions. (Exhibit H Literary Works, excerpt of my literary works that I want to copyright & a copyright form with instructions)
- 19. SOE Howard personally prevents me from finishing and making the requisite photocopies of my typed 'best edition' of my literary manuscript for the U.S. Copyright application process by stating that "they are not legal documents". When I informed her that it is a legal process, she changed her definition of legal to mean that inmates can only type and photocopy legal documents that are connected the criminal cases for which they were sentenced to FCI-Seagoville. Likewise, inmates are prevented from photocopying all handwritten nonlegal manuscripts. (Exhibit H Literary Works, excerpt of my literary works that I want to copyright & a copyright form with instructions)

- 20. My BOP record reflects that I had been approved for and had begun a paralegal certification correspondence course through the Blackstone Career Institute in May 2023. (Exhibit I Correspondence Courses, BOP SENTRY entry reflecting correspondence course) However, I have had to abandon this paid course of study due to SOE Howard's policies preventing my use of a typewriter and the Inmate Trustfund Photocopy Machine for nonlegal educational correspondence course work. However, a 2/26/2024 "Memorandum For Inmate Population" authored by Warden Scarlet Grant incongruently encourages "each of you to use your time at this facility in the most positive, and productive manner possible. Enroll in GED, college courses, faithbased courses,..." etc. It should be noted that FCI-Seagoville has not offered any academic college courses since I arrived here in March 2023, which is why I had attempted to import my own through correspondence courses. (Exhibit C Public Postings, 2/26/2024 Memorandum from Warden Grant)
- 21. I have also had to abandon a Creative Writing correspondence course from the College Guild and a journalism correspondence course from the Prison Journalism Project as SOE Howard's policies prevent me from creating the required legible course work and they prevent me from photocopying my course work before placing that work into the mail to the schools.
- 22. I am a disabled military veteran (VA #1214949160), and have a need to file with the Veterans Administration to increase my disability rating due to additional service connected medical/health issues that are becoming evident with age. The VA application and review processes are quite lengthy, and require the filling out of forms, and the typing of narratives. The policies of SOE Howard are preventing me from using the typewriters and Inmate Trustfund Photocopy Machine for this purpose.
- 23. SOE Howard frequently monitors what inmates are typing, and upon finding an inmate typing nonlegal documents, she often and loudly humiliates the inmate in front of others before confiscating their nonlegal work and kicking them off the typewriter.
- 24. Before SOE Howard implemented these personal policies, approx. 8 of the 11 accessible typewriters in the library would be in use by inmates at any given time. This average has dropped to about 2 since the implementation of these restrictions.
- 25. SOE Howard has personally stated to me and other inmates that she does not allow the typing and photocopying of nonlegal documents because inmates will "write to outside news organizations". This is an improper motive and is an attempt to suppress First Amendment rights.
- 26. In June 2023, the Associate Warden, Aaron Greenfield, chose me to be the editor of a new inmate produced newsletter to serve the incarcerated military veterans at FCI-Seagoville.
- 27. SOE Howard refused to allow use of the typewriters for this newsletter despite that it had been requested and authorized by her direct superior. SOE Howard personally told me that, "You can do it by hand." As such, AW Greenfield sent Counselor Sandles to SOE Howard's education building to physically take a typewriter, which was then placed into my room within my housing unit resulting in my being the only inmate at this facility to have a typewriter.

- 28. SOE Howard became very upset over the taking of this typewriter from her control and she deeply resented the exception to her "legal only" doctrine that AW Greenfield's action had created.
- 29. The first issue of the Seagoville Bars & Stripes newsletter was published in June 2023, and there had been 14 subsequent monthly editions published until AW Greenfield's recent retirement. (Exhibit H Literary Works, June & July 2024 Seagoville Bars & Stripes newsletters) Our inmate newsletter had garnered some serious positive attention from reputable outside organizations, i.e., Texas Historical Commission, Johns Hopkins University, and Society of Professional Journalists. (Exhibit H Literary Works, Letters from Texas Historical Commission & Johns Hopkins University)
- 30. On 8/30/2023, SOE Howard unplugged the Inmate Trustfund Photocopy Machine from the library's common area within the education building where it had always been openly available at all hours for the copying of inmate legal and nonlegal documents, and moved it to the hallway across from her office. She then posted a new policy restricting its use to only one hour per business day. (Exhibit C Public Postings)
- 31. On 9/6/2023, and without notice, SOE Howard posted a new policy restricting the use of the Inmate Trustfund Photocopy Machine to "legal work only" without defining legal work. Now, every time an inmate needs to make copies, SOE Howard or her staff looks at the documents and speculates as to whether they are legal or not before authorizing or denying copies. (Exhibit C Public Postings)
- 32. By September 2023, the then-Warden Rivers and his assistant, Ms. Bornham, personally acknowledged to me that over 100 inmates had submitted BP-9 complaints to the Warden's office about this deprivation. This admission was in response to my inquiry to them at Mainline as to why it was taking so long for the Warden to respond to my own BP-9 complaint on this issue.
- 33. Inmates who can afford the postage, have willing family on the outside, and who are not afraid of entrusting the USPS mail with their original documents, can send their documents out to have copies made and sent back in any quantity. As this is allowed at FCI-Seagoville, the issues surrounding the copy machine is not that we cannot possess copies of nonlegal documents. However, I do not have willing family on the outside, I am not willing to trust the USPS with my originals, and the lengthy turn-around time of this back-door copying is prohibitive.
- 34. All of these restrictive personal policies were put into place by SOE Howard without any prior notice to inmates who had purchased copy cards and typing ribbons.
- 35. Each copy card costs \$6.50, and is good for 50 copies. SOE Howard is deliberately indifferent to my inability to fully use my purchased copy cards.
- 36. I want to participate in the Recreation Department's Hobby Craft program, but inmates who need to make copies of hobby craft patterns, especially those who need to enlarge such patterns via copy machine due to poor eye sight (such as me), are told by SOE Howard that the Inmate Trustfund Photocopy Machine can no longer be used for this purpose, and that such copies should be made at the hobby craft building, which SOE Howard knows does not have a copy machine for inmates to purchase copies.

- 37. I want to make copies of things that hold religious significance to me, but I am prevented from doing so due to SOE Howard's policies. Instead, SOE Howard directs inmates to Religious Services to make copies with full knowledge that there is no way for inmates to purchase photocopies at Religious Services.
- 38. Both the Recreation (Hobby Craft) and Religious Services departments point inmates to the Inmate Trustfund Photocopy Machine in the education building to make personal copies stating that, "That is what the Inmate Trustfund Copier is for."
- 39. I would like to become a "Legal Writer" contributor to Prison Legal News, which is published by the Human Rights Defence Center. (Exhibit H Literary Works, PLN advertisement seeking incarcerated legal writers) This productive activity requires the use of a typewriter and the Inmate Trustfund Photocopy Machine, and at my own cost. I am prevented from engaging as a legal writing contributor by the personal policies of SOE Howard.
- 40. Coincidentally, during the span of one year (2022 to 2023), the cost of the typing ribbons to inmates increased twice from \$8.95 to &15.60, then to the current \$21.55, and the correction ribbons increased from \$.90 to \$3.90. In contrast, the general public pays only \$10 retail online for the typing ribbon. (Exhibit D General Exhibits, ribbon purchase receipts and online cost)
- 41. SOE Howard and Warden Grant are aware of the pain that I incur while writing by hand because I had informed both via electronic messages directed to their separate inboxes as well as BP-8s and BP-9s. Those messages clearly communicated my medical condition and a clear request for the reasonable accommodation of my disability through the use of the typewriters and Inmate Trustfund Photocopy Machine for both legal and nonlegal document creation and duplication. (Exhibit F Administrative Remedies)
- 42. SOE Lauren Howard is able to grant general inmate use of the typewriters and the Inmate Trustfund Photocopy Machine, and can grant reasonable accommodation of disabilities through access to these devices because she is the Supervisor of Education and the creator and enforcer of these policies.
- 43. Warden Scarlet Grant is able to grant general inmate use of the typewriters and the Inmate Trustfund Photocopy Machine, and can grant reasonable accommodation of disabilities through access to these devices because she exercises superior authority, and can override actions of subordinates. Furthermore, a now retired Associate Warden had exercised this overriding authority in June 2023, as was previously detailed in #27 and #28 above regarding the Seagoville Bars & Stripes inmate newsletter.
- 44. South Central Regional Director Heriberto Tellez is able to grant my requested relief because the administrative remedy process includes an appeal to his office, and his office reviews and exercises superior authority over the actions of subordinates.

- 45. Federal Bureau of Prisons Director Colette Peters, Central Office Wasington, D.C., is able to grant my requested relief because the administrative remedy process includes an appeal to her office, and her office reviews and exercises superior authority over the actions of subordinates.
- 46. All levels of the BOP administrative remedy/grievance process have been thoroughly exhausted with the claims/complaints stated herein.
- 47. In August 2024, Associate Warden Aaron Greenfield retired. After his departure, SOE Howard promptly removed the typewriter that the AW had provided for me to use, and reimposed her personal policy of "only legal documents" on my use of the typewriters. SOE Howard's action was in retaliation for the essay "BOP Offers Higher 'Degrees'" (Exhibit H Literary Works) that I had authored and that she had discovered online, and her resentment for AW Greenfield having taken one of her typewriters for my use on the inmate newsletter in 2023.
- 48. Upon advice from a legal scholar, and to follow BOP Program statements that instruct that individual issues/complaints must be brought through separate administrative remedy requests, I recently submitted several separate and specific electronic messages to SOE Howard that separately focused on the individual aspects of the issues detailed above with particular emphasis (and urgency) on the progressive disability in my right hand (to which I was requesting a reasonable accommodation) in an attempt to get equally separate and specific responses that would satisfy the PLRA exhaustion requirement. (Exhibit E Electronic Messages)
- 49. On or before 10/22/2024, SOE Howard contacted Special Investigatory Services (SIS), and improperly characterized the above described electronic messages as "harrassment".
- 50. On 10/22/2024 @ 12:20pm, I was summoned to interim Associate Warden Rhodes' office, whereupon, SIS Lt. Hill and AW Rhodes interviewed me separately. These interviews clearly established that SOE Howard had engaged in retaliation against my use of the administrative remedy process's first step "informal resolution". SIS gave me only a "verbal warning" despite that I had requested them to issue me an incident report if I had done anything wrong.
- 51. On 11/12/2024, I was summoned to building #9 a second time and was given another warning by SIS Mr. White, who stated that he needed to assess my "threat level" to make sure that I wasn't going "to stab SOE Howard or something". I responded that I am a disabled military veteran (an ambulating T-6 paraplegic [incomplete]) with no disciplinary record since my arrest seven years ago, I am highly engaged in rehabilitative and educational programming, and live in a special housing unit for military veterans which doesn't quite rise to the level of person that SIS should be investigating this intensely, and that SOE Howard's improper characterizations coupled with these intimidating SIS interviews are thoroughly chilling my ability to exhaust my administrative remedies. (Exhibit G Declarations/Affidavits, declaration detailing both SIS interviews)
- 52. I want to communicate the above issues, veterans/disability concerns, and other topics to my congressmen and senators, but cannot do so because: (1) ALL

inmates at FCI-Seagoville are prevented from typing "nonlegal" documents by SOE Howard's policies that have been rubber-stamped by the BOP Regional and Central Office (DC), (2) I do not have the electronic messaging privilege that is given to some inmates, (3) I cannot call because the BOP telephone system requires that a person answer and press #5 to accept my call, and, as such, is incompatible with all automated business telephone systems, (4) I have the added medical issue with my writing hand.

- 53. For identical reasons, I am unable to participate in educational correspondence course programs including those offered by the Christian College & Seminary, the College Guild, The Prison Journalism Project, Blackstone Career Institute; each of of which have expressed interest in my speech, and to which I would like to communicate. (Exhibit I Correspondence Courses) The American Prison Writing Archive at Johns Hopkins University has also expressed interest in my speech but am no longer able to communicate with them for the same reasons. (Exhibit D General, 10/22/2024 letter from the American Prison Writing Archive)
- 54. Up until AW Greenfield's retirement in August 2024, I was additionally engaged in the translations of a series of German "Enemy Alien" internee newsletters that had been produced from 1943 to 1945 at Seagoville that I had discovered online with the help of outside parties. (Exhibit H Literary Works, June & July 2024 Seagoville Bars & Stripes newsletters) Furthermore, I had been providing the Texas Historical Commission, German American Internee Coalition, and the Johns Hopkins University with copies of these translated German internee newsletters because of the historical value to them of these records. (Exhibit D General Exhibits, letters from the Texas Historical Commission and the American Prison Writing Archive at Johns Hopkins University) Due to AW Greenfield's retirement and the restrictive policies of SOE Howard, I am no longer able to type and photocopy these documents for the benefit of these institutions.
- 55. The enforcement of these personal policies by SOE Howard and her immediate staff is conducted with such oppressive zeal, that some of the exhibits that are attached to this complaint, i.e., the June & July 2024 Bars & Stripes newsletter, were not allowed to be photocopied at various times throughout the lengthy, multi-step grievance exhaustion process when I had attempted to have them photocopied in order to attach them as exhibits to my BP-8, BP-9, BP-10, and BP-11 complaints on this very issue. I ask the court to observe that the June & July 2024 Bars & Stripes in Exhibit H Literary Works, bear stamps of authorization from AW Greenfield and Unit Team, Ms. Evans, respectively.
- 56. While other BOP facilities might similarly interpret the governing BOP Program Statements just as narrowly and erroneously as SOE Howard, I have spoken with several inmates who had transferred from other BOP facilities and they have confirmed that the facilities from which they came had permitted open use of their typewriters and Inmate Trustfund Photocopy Machines by inmates. At the same time, the BOP Central Office's rubber-stamp approval of SOE Howard's policies demonstrates that it will take no action against any BOP facility that choses to implement similar restrictions.
- 57. All administrative remedies have been fully exhausted for this complaint.

Relief Requested

- Injunctive Relief, including the resoration of inmate use of the typewriters and Inmate Trustfund Photocopy Machine for broadly defined legal work as well as all nonlegal works that fall within BOP Program Statement \$5350.27, Inmate Manuscripts.
- · Declaratory Relief, including:
 - Declaration of a non-exhaustive list of things that the court considers to be "legal work", which, at a minimum, would include communications with attorneys; the filling out of government forms, i.e., IRS, Copyright Office applications, VA forms, Social Security forms; contracts; letters to any state or federal agency; letters to any elected official, etc.
 - Declaration that the BOP Program Statements, particularly §1315.07 and §5350.27, are not mutually exclusive.
- · Costs of suit, reasonable attorneys fees, and any other appropriate relief.

Date: 12/10/2024

Certification

I declare under the penalty of perjury that everything within this filing is true and correct.

Respectfully submitted,

Attached

Exhibit A - BOP Medical Documents

B - CFR & BOP Program Statements

C - Public Postings

D - General Exhibits

E - Electronic Messages

F - Administrative Remedies

G - Declarations/Affidavits

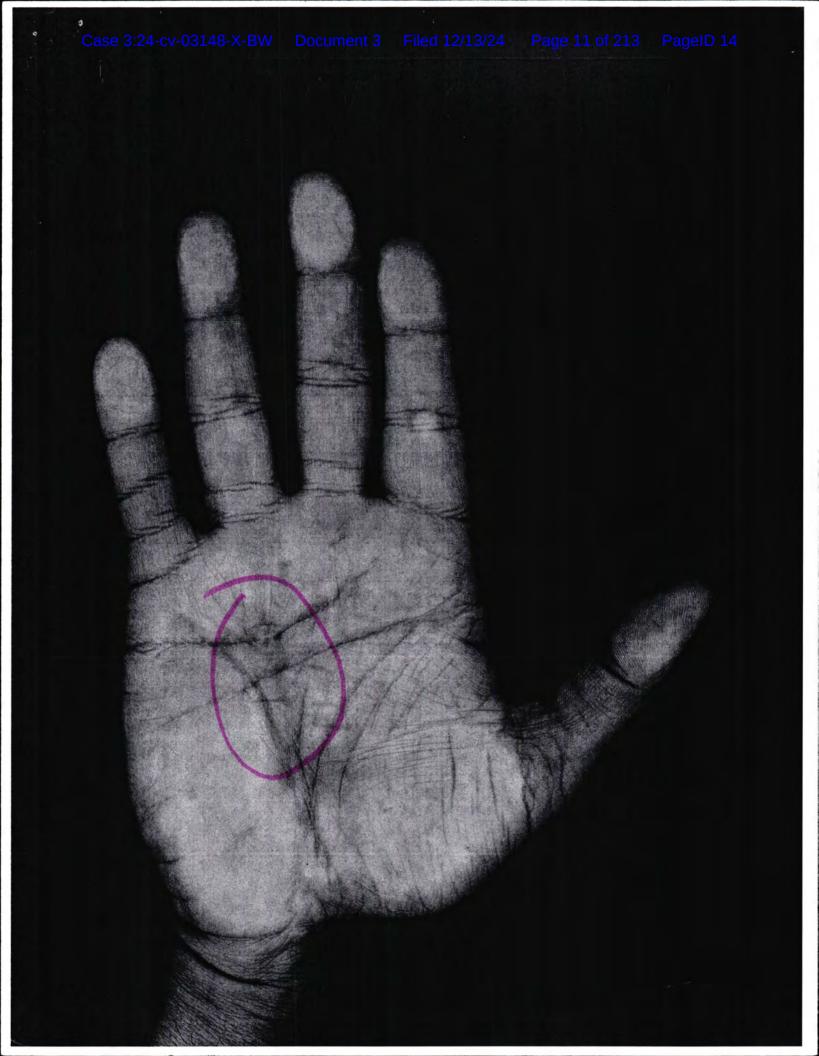
H - Literary Works

I - Correspondence Courses

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Exhibit A

BOP Medical Documents





FCI Seagoville SEA

DOB:

Age:

Status:

03/30/66

58

OP

Patient: MORRIS, RANDALL (Male)

15141-010

Date: 10/21/24 11:11

Slicecount: 3

Register#:

History: Contracture of middle of R-Hand, noticed 2 years ago, pain is increasing especially when

writing

Priors:

Exams: XR RIGHT HAND, 3 views

Referring Phy: DILLARD

Ordering Phy: Ordering Phy #:

Accession Numbers: 1.2.840.113619.2.203.4.2147483647.1729518523.503978

Final Report

Exam: XR RIGHT HAND

HISTORY: see above

TECHNIQUE: 3 views of the hand

COMPARISON: None

FINDINGS: Normal bone mineralization. No acute fracture, dislocation or malalignment.

Minimal degenerative arthritic changes involving the second through fifth finger DIP joints.

The other remaining joint spaces appear maintained. Small periarticular erosion on the radial side at the base of the second finger proximal phalanx.

The soft tissues appear unremarkable.

IMPRESSION:

- 1. Minimal DJD of the second through fifth finger DIP joints.
- Small periarticular erosion on the radial side at the base of the second finger proximal phalanx with maintained second MCP joint spacing. This could be secondary to gout. No extra-articular calcifications.
- 3. Remainder the joint spaces of the hand appear maintained without any additional erosions.
- 4. No acute fracture, dislocation or malalignment.

Radiologist: Justin Yoon, MD

Study first marked ready to read at 11:11, study last marked ready to read at 11:11, initial results transmitted at 11:25



Report Status: Final

MORRIS, RANDALL

Patient Information	Specimen Information	Client Information
MORRIS, RANDALL DOB: 03/30/1966 AGE: 58 Gender: M Phone: NG Patient ID: 15141-010	Specimen: DL144684Q Requisition: 6286078 Lab Ref #: 285241637 Collected: 10/16/2024 / 08:51 CDT Received: 10/17/2024 / 02:26 CDT Reported: 10/17/2024 / 06:49 CDT	Client #: 33826 IR21MAIL DILLARD, LAVONDA FCI SEAGOVILLE 2113 N HIGHWAY 175 SEAGOVILLE, TX 75159-2237

Test Name In Range Out Of Range Reference Range Lab SED RATE BY MODIFIED IG WESTERGREN 11 < OR = 20 mm/h

PERFORMING SITE:

QUEST DIAGNOSTICS DALLAS LAB, 4770 REGENT BOULEVARD, IRVING, TX 75063-2445 Laboratory Director: CLARE MCCORMICK-BAW, MD PHD, CLIA: 45D0697943

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FMC Butner

1000 Old Highway NC 75 Butner, NC 27509 919-575-3900 x5707

*** Sensitive But Unclassified ***

Name MORRIS, RANDALL

Reg # 15141-010 DOB 03/30/1966

Sex M Facility FCI Seagoville Order Unit F02-228L

Provider LaVonda Dillard, NP, FNP-C

Collected 10/16/2024 08:51 CDT Received 10/17/2024 10:48 CDT Reported 10/17/2024 12:35 CDT

LIS ID 285241637

CHEMISTRY

Uric Acid 6.6 3.5-7.2 mg/dL

FLAG LEGEND L=Low L!=Low Critical H=High H!=High Critical A=Abnormal A! =Abnormal Critical

Bureau of Prisons Health Services Clinical Encounter - Administrative Note

Inmate Name: MORRIS, RANDALL ALLEN

Date of Birth: 03/30/1966 Note Date:

09/20/2024 11:00

Sex: Provider:

M Race: WHITE Bandas, K. (MOUD) M

Reg #: Facility: 15141-010

SEA Unit: F02

Reviewed Health Status:

Review Note - Document Review encounter performed at Health Services.

Administrative Notes:

ADMINISTRATIVE NOTE 1

Provider: Bandas, K. (MOUD) FNP-C

Note previously addressed.

Copay Required: No

Cosign Required: No

Telephone/Verbal Order: No

Completed by Bandas, K. (MOUD) FNP-C on 09/20/2024 11:01

Bureau of Prisons Health Services Clinical Encounter

Inmate Name: MORRIS, RANDALL ALLEN

Date of Birth: 03/30/1966

Encounter Date: 10/11/2024 11:01

Sex:

Race: WHITE

Reg #: 15141-010

Facility: SEA Provider: Dillard, L. (MOUD) FNP-C Unit: F02

Reviewed Health Status: Yes

Advanced Practice Provider - Sick Call Note encounter performed at Health Services.

SUBJECTIVE:

COMPLAINT 1

Provider: Dillard, L. (MOUD) FNP-C

Chief Complaint:

ORTHOPEDIC/RHEUMATOLOGY

Subjective:

patient states that he his hand has been contracted in the middle in the right hand, patient first noticed this problem about 2 years ago when he was in the county jail, patient states that the pain has gotten progressively worse and the pain is much worse when when he tries to write. patient has tried tylenol and nsaids for the pain and it has not worked.

Pain:

Yes

Pain Assessment

Date:

10/11/2024 11:04

Location:

Hand-Right

Quality of Pain:

Aching

Pain Scale:

Intervention:

otc

Trauma Date/Year:

Injury:

Mechanism:

Onset:

1-5 Years

Duration:

1-5 Years

Exacerbating Factors:

movement

Relieving Factors:

nothing

Reason Not Done:

Comments:

Allergies:

Allergy

Reaction

Comments

No Known Allergies

Allergies list reviewed/updated for the presence or absence of allergies, sensitivities, and other reactions to drugs, materials, food and environmental factors with the patient on 10/11/2024 11:01 by Dillard, L. (MOUD) FNP-C

OBJECTIVE:

Pulse:

Time Date

Rate Per Minute Location

Rhythm

Provider

10/11/2024 11:06 SEA

75

Dillard, L. (MOUD) FNP-C

Respirations:

Date

Time

Rate Per Minute Provider

10/11/2024

11:06 SEA

16 Dillard, L. (MOUD) FNP-C

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Inmate Name: MORRIS, RANDALL ALLEN

Reg #: 15141-010

Date of Birth: 03/30/1966 Sex: Race: WHITE Facility: SEA Encounter Date: 10/11/2024 11:01 Provider: Dillard, L. (MOUD) FNP-C Unit: F02

Date

Time

Rate Per Minute Provider

Blood Pressure:

Date Time 10/11/2024 11:06 SEA 140/93

Value Location Position

Cuff Size Provider

Dillard, L. (MOUD) FNP-C

SaO2:

Date

10/11/2024

Time

11:06 SEA

Value(%) Air 97

Provider

Dillard, L. (MOUD) FNP-C

Exam:

General

Affect

Yes: Cooperative

Appearance

Yes: Appears Well, Alert and Oriented x 3

Pulmonary

Observation/Inspection

Yes: Within Normal Limits

Auscultation

Yes: Clear to Auscultation

Cardiovascular

Arterial Pulse

Yes: Within Normal Limits

Peripheral Vascular

Arms

Yes: Radial Pulse Normal R, Brachial Pulse Normal R, Ulnar Pulse Normal R, Capillary Refill Normal R

Musculoskeletal

Wrist/Hand/Fingers

Yes: Full Range of Motion, Inflammation, Warm to Touch Tenderness

Exam Comments

patient has problems with gripping and writing. patient is having problems with completing adls patient has contractor in the right hand the grip is less on the right side. positive capillary refill, positive pulses.

denies any color changes of the hand when waking up in the morning

ASSESSMENT:

Contracture, unspecified joint, M2450 - Current - right hand

Acetaminophen 325 MG Tablet

PLAN:

Rx#

New Medication Orders:

Medication predniSONE Tablet **Order Date**

10/11/2024 11:01

Orally(1) 40mg - daily x 4 day(s) -- *** (2) 20mg - daily x 3 day(s) -- *** Prescriber Order:

(3) 10mg - daily x 2 day(s) --

Indication: Contracture, unspecified joint

10/11/2024 11:01

Case 3:24-cv-03148-X-BW Filed 12/13/24 Document 3 Page 18 of 213 PageID 21

MORRIS, RANDALL ALLEN Inmate Name:

15141-010 Reg #: Date of Birth: 03/30/1966 Sex: Race: WHITE Facility: SEA Encounter Date: 10/11/2024 11:01 Unit: F02 Provider: Dillard, L. (MOUD) FNP-C

New Medication Orders:

Order Date Rx# Medication

> 650mg Orally - Two Times a Day x 10 day(s) Prescriber Order:

Indication: Contracture, unspecified joint

New Laboratory Requests:

Details **Due Date** Frequency Priority One Time 10/16/2024 00:00 Lab Tests-U-Uric Acid Routine

Lab Tests-S-Sedimentation Rate

Labs requested to be reviewed by: Gupta, R. (MOUD) MD/CD Lab results requested to be notified to: Bandas, K. (MOUD) FNP-C

New Radiology Request Orders:

End Date Details Frequency Due Date Priority General Radiology-Hand-2 View PA/Obl One Time 10/22/2024 Routine

[Right]

Specific reason(s) for request (Complaints and findings):

pain

New Consultation Requests:

Consultation/Procedure Target Date Scheduled Target Date Priority Translator Language

Orthopedist 12/31/2024 12/31/2024 Routine No

Subtype:

Orthopedist Appt, non-surgical, NOS

Reason for Request:

58 year old patient has problems with gripping and writing, patient is having problems with completed his activities of daily living, patient has contractor in the right hand the grip is less on the right side, positive capillary refill, positive pulses.

denies any color changes of the hand when waking up in the morning

Disposition:

Follow-up at Sick Call as Needed

Other:

discussed plan of care with the patient. answered all questions. patient agreeable to the plan of care. advised patient to take medications as prescribed discussed possible side effects patient verbalized understanding

Patient Education Topics:

Date Initiated Format Handout/Topic Provider Outcome Access to Care Verbalizes 10/11/2024 Counseling Dillard, L. Understanding 10/11/2024 Compliance - Treatment Dillard, L. Counseling Verbalizes Understanding 10/11/2024 Counseling New Medication Dillard, L. Verbalizes Understanding Medication Side Effects 10/11/2024 Counseling Dillard, L. Verbalizes Understanding

Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 19 of 213 PageID 22

Inmate Name: MORRIS, RANDALL ALLEN Reg #: 15141-010

Date of Birth: 03/30/1966 Sex: M Race: WHITE Facility: SEA Encounter Date: 10/11/2024 11:01 Provider: Dillard, L. (MOUD) FNP-C Unit: F02

Copay Required: Yes Cosign Required: No

Telephone/Verbal Order: No

Completed by Dillard, L. (MOUD) FNP-C on 10/11/2024 11:36

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Bureau of Prisons Health Services Clinical Encounter - Administrative Note

Inmate Name: MORRIS, RANDALL ALLEN

Date of Birth: 03/30/1966

10/23/2024 13:33

Sex: Provider:

Race: WHITE Dillard, L. (MOUD) FNP-

Reg #: Facility: 15141-010

SEA Unit: F02

Reviewed Health Status:

Review Note - Document Review encounter performed at Health Services.

Administrative Notes:

Note Date:

ADMINISTRATIVE NOTE 1

Provider: Dillard, L. (MOUD) FNP-C

forward to pcp for review

Exam: XR RIGHT HAND HISTORY: see above

TECHNIQUE: 3 views of the hand

COMPARISON: None

FINDINGS: Normal bone mineralization. No acute fracture, dislocation or malalignment. Minimal degenerative arthritic changes involving the second through fifth finger DIP joints.

The other remaining joint spaces appear maintained. Small periarticular erosion on the radial side at the base of the second finger proximal phalanx.

The soft tissues appear unremarkable.

IMPRESSION:

1. Minimal DJD of the second through fifth finger DIP joints.

- 2. Small periarticular erosion on the radial side at the base of the second finger proximal phalanx with maintained second MCP joint spacing. This could be secondary to gout. No extra-articular calcifications.
- 3. Remainder the joint spaces of the hand appear maintained without any additional erosions.

4. No acute fracture, dislocation or malalignment.

Copay Required: No Cosign Required: No

Telephone/Verbal Order: No

Completed by Dillard, L. (MOUD) FNP-C on 10/23/2024 13:34 Requested to be reviewed by Bandas, K. (MOUD) FNP-C. Review documentation will be displayed on the following page.



Diseases & Communical

Dupuytren contracture

Symptoms & causes

Doctors &

Overview

Dupuytren contracture is a condition that causes one or more fingers to bend toward the palm of the hand. The affected fingers can't straighten completely.

Knots of tissue form under the skin. They eventually create a thick cord that can pull the fingers into a bent position. The condition gradually gets worse with time.

Dupuytren contracture most often affects the two fingers farthest from the thumb. This can complicate everyday activities such as placing your hands in your pockets, putting on gloves or shaking hands.

There's no cure for Dupuytren contracture. Treatments can relieve symptoms and slow how quickly the condition gets worse.

Symptoms

Dupuytren contracture gets worse slowly, over years. The condition begins with a firm lump in the palm of the hand. This lump can be painful or painless.

Over time, the lump can extend into a hard cord under the skin and up into the finger. This cord tightens and pulls the finger toward the palm, sometimes severely.

Dupuytren contracture most commonly affects the two fingers farthest from the thumb. The condition often occurs in both hands.

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Causes

The cause of Dupuytren contracture is unknown. The condition tends to run in families. It's more common in men than in women.

Risk factors

Risk factors for Dupuytren contracture include:

- Age. Dupuytren contracture occurs most commonly after the age of 50.
- Sex. Men are much more likely to develop Dupuytren than are women.
 In men, symptoms may be worse and progress more quickly.
- Ancestry. People of Northern European descent are at higher risk of the disease.

(https://www.assh.org/s/)

(https://www.assh.org/handcare)

Dupuytren's Contracture

What is Dupuytren's Contracture?

Dupuytren's contracture is a disorder of the palm of the hand and fingers. In the normal hand there is a fibrous tissue called fascia. Fascia covers the important nerves, blood vessels, muscles, and tendons. Fascia also stabilizes the skin. In Dupuytren's disease, this fascia can become abnormal. It becomes thicker, forming cords. These cords are often mistaken for a tendon because they look and feel similar. Unlike a tendon that is moved by a muscle that shortens and lengthens, cord tissue is not connected to a muscle. Cord tissue is static and does not move. There may be a single cord or several. Cords can be separate or connected.

Most people with Dupuytren's contracture will also have nodules or bumps in the hand. When they are first noticed, these nodules and cords may not change for a long time. They can also have a slow or fast change. Cords and nodules may become bigger and thicker over time. They may begin to pull the fingers into a bent (flexed) position so the fingers are bent toward the palm. This makes it impossible to fully open the fingers (Figures 1 and 2). This can become bothersome and limit use of the hand in many people.

Causes

The exact cause of Dupuytren's contracture is unknown and very complex. It is a hereditary disease. This means family history and ancestry play a role. The problem is more common in men, people over age 40, and people of Northern European descent. It is less common in African and Middle Eastern descent. Smoking, diabetes, alcohol, lower body mass index, and aging are also all related to Dupuytren's.

There is no evidence that hand injuries or specific jobs lead to a higher risk of developing Dupuytren's contracture. There may be a mild relationship to trauma in someone who is at risk. Occasionally after a distal radius (wrist) fracture, a patient may develop a single nodule in the palm. This nodule may or may not be tender. It often does not progress to result in a bent finger joint.

(https://www.assh.org/s/)

(https://www.assh.org/handcare)

cords may develop from the palm into one or more fingers. These cords may cause bending of the fingers. The ring finger and little finger are most commonly involved. One or both hands can be affected. Each hand can be affected in a different pattern and at different times.

The lumps can be uncomfortable in some people. However; in most people, Dupuytren's contracture is not typically painful. The disease may first be noticed due to difficulty in placing the hand flat on a surface (Figure 3) or opening the hand fully. It may be more difficult to wash hands, wear gloves, hold large objects, and get hands into pockets. When it involves the right hand, people can find it awkward to shake hands.

It is difficult to predict how the disease will progress. Some people have only small lumps or cords while others will develop severely bent fingers. There are a variety of risk factors. The disease tends to be more severe if it occurs at an earlier age. Men develop more severe symptoms when compared to women. If you have many relatives with the problem, you may be at higher risk for more severe disease. If there are changes in other areas of the body, you are at higher risk. This is called Dupuytren's diathesis. Lumps and cords can develop on the soles of the feet (plantar fibromatosis) or the genital location in men (Peyronie's disease). Occasionally, the disease will cause thickening on top of the knuckles called a knuckle pad (or Garrod's pad).

Treatment

The presence of a lump in the palm does not mean that treatment is required or that the disease will progress. Also, not all lumps in the palm are Dupuytren's. Therefore, it can be helpful to see a hand surgeon for an examination. Sometimes a history and examination is all that is needed to evaluate a mass. Other times, imaging such as an x-ray, ultrasound, or MRI may be indicated. Some factors that are important in evaluating masses include their size, "feel" (such as firm or squishy), location, presence of pain, movement of mass or skin around the mass, family history, and other medical conditions that may be present. In mild cases, especially if hand function is good, only observation is needed. Splinting or stretching typically does not prevent worsening of the contracture but is safe to

try.

For contractures that become bothersome, there are nonsurgical and surgical options. These are typically discussed when the contracture prevents the hand from lying flat on a table. A hand surgeon



DISEASES & CONDITIONS

Dupuytren's Disease

Dupuytren's disease is a condition that affects the palmar fascia — the fibrous layer of tissue that lies underneath the skin and above the tendons, nerves, blood vessels, and bones in the palm and fingers.

In patients with Dupuytren's, the fascia thickens and contracts (shortens) over time. The fascia may pull on the fingers during this process, causing them to be forced inward, toward the palm. This may make it difficult or impossible to fully straighten the fingers, resulting in what is known as a "Dupuytren's contracture."

In some people, a worsening Dupuytren's contracture can interfere with hand function, making it difficult to perform daily activities. When this occurs, there are nonsurgical and surgical treatment options available to help slow the progression (worsening) of the disease and improve motion in the affected fingers.

Description

The fascia is a layer of tissue that helps to anchor and stabilize the skin on the palm side of the hand. Without the fascia, the skin on your palm would be as loose and moveable as the skin on the back of your hand. In patients with Dupuytren's disease, this palmar fascia gradually thickens and contracts (shortens).

Dupuytren's is usually first detected when lumps of tissue, or nodules, form under the skin in the palm. This may be followed by pitting (deep dents) on the surface of the palm as the diseased tissue pulls on the overlying skin.

As Dupuytren's gets worse, bands of fascia in the palm develop into thick cords that can tether (lock) one or more fingers and the thumb into a bent position. This is called a "Dupuytren's contracture." Although the cords in the palm may look like tendons, the tendons are not involved in Dupuytren's.

In many cases, a Dupuytren's contracture progresses (gets worse) very slowly, over a period of years, and may remain mild enough that no treatment is needed. In moderate or severe cases, however, the condition makes it difficult to straighten the involved digits. When this happens, treatment may be needed to help reduce the contracture and improve motion in the affected fingers. Typically, as a contracture worsens, the involvement of the fascia becomes more severe, and treatment is less likely to result in a complete correction.

Cause

The cause of Dupuytren's disease is not completely known, but most evidence points toward genetics as having the most important role.

There are anecdotal reports (based on personal accounts) of Dupuytren's developing or worsening after a person experiences an injury or an open wound (including surgery) to their hand; however, there is no good evidence to support this. There is also no convincing evidence to suggest that it is caused by overuse of the hand.

Risk Factors

There are many factors that are believed to contribute to the development or worsening of Dupuytren's disease. These include:

- · Gender. Biologic men are more likely to develop the condition than biologic women.
- Ancestry. People of northern European (English, Irish, Scottish, French, and Dutch) and Scandinavian (Swedish, Norwegian, and Finnish) ancestry are more likely to develop the condition.
- · Heredity. Dupuytren's often runs in families.
- · Alcohol use. Drinking alcohol may be associated with Dupuytren's.
- Certain medical conditions. People with diabetes and seizure disorders are more likely to have Dupuytren's.
- Age. The incidence of the condition increases with age.
- Trauma. Dupuytren's disease may appear and/or worsen after trauma —including surgery to the hand.

Symptoms

A Dupuytren's contracture typically progresses (gets worse) very slowly, over a period of years. Signs and symptoms of the condition may include:

Nodules. You may develop one or more small lumps, or nodules, in the palm of your hand. These nodules are typically fixed to the overlying skin. Initially, the nodules may feel tender. Over time, this tenderness usually goes away. In some cases, there can be "pitting," or deep dents, in the skin near the nodules.

Cords. The nodules may thicken and contract, contributing to the formation of dense and tough cords of tissue under the skin. These cords can limit or prevent the fingers and thumb from straightening or from spreading apart.

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Contractures. As the tissue under the skin tightens, one or more of your fingers may be pulled toward your palm, and you may have trouble spreading them apart. The ring and little (pinky) fingers are most commonly affected, but any or all of the fingers and thumb can be involved.

When a finger is involved in a Dupuytren's contracture:

- The metacarpophalangeal (MCP) joint is the most common joint to be affected. This is the joint where the finger meets the hand (knuckle).
- The next most common joint to be affected is the proximal interphalangeal (PIP) joint. This is the next
 joint in the middle of the finger after the MCP joint. Contractures of the PIP joint are harder to treat and
 less likely to completely recover after treatment than contractures of the MCP joint.
- The distal interphalangeal (DIP) joint, the last joint of the fingers (closest to the fingernail). is less likely than the PIP and MCP joints to be affected by Dupuytren's disease.

Dupuytren's disease can be progressive, meaning it gets worse over time. As the bend in your finger increases, it may be hard to straighten it fully. It may be difficult to grasp large objects, put your hand in your pocket, or perform other simple activities.

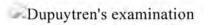
Some patients with Dupuytren's disease may develop thickened tissue on the feet (Ledderhose disease) or penis (Peyronie's disease). Symptoms do not typically occur anywhere else on the body.

Doctor Examination

Your doctor will likely talk with you about your general health and medical history and ask about your symptoms. Because Dupuytren's can run in families, your doctor may ask if you are aware of any relatives who have the disease.

Your doctor will then examine your fingers and hand. During the exam, they will likely:

- · Record the location of nodules and cords on your palm
- · Measure the range of motion of your fingers and thumb
- Test the feeling in your fingers and thumb
- In some cases, document the appearance of your hand with clinical photographs



During the exam, your doctor will measure the contracture in your finger, and record the location of the cords and nodules. Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 28 of 213 PageID 31

Exhibit B

CFR & BOP Program Statements

OGC - office of General Counsel OPI:

1315.07 11/5/99 NUMBER: DATE:

Legal Activities, Inmate SUBJECT:

Code of Federal Resolutions 28 CFR

10. [LEGAL /RESEARCH AND PREPARATION OF LEGAL DOCUMENTS \$543.11

Unless clearly impractical, the Warden shall allow an inmate preparing legal documents to use a typewriter, or if the inmate cannot type, to have another inmate type his documents. The Warden may allow the inmate to hire a public stenographer to type documents outside the institution, but the institution may not assume the expense of hiring the public stenographer. shall advise the inmate of any delay in the typing of which they have received notice from the stenographer.

OPI: FPI

NUMBER: 5300.21

DATE: 2/18/2002

SUBJECT: Education, Training and Leisure Time Program Standards

[PURPOSE AND SCOPE §544.80. In consideration of inmate education, occupation, and leisure-time needs, the Bureau of Prisons affords inmates the opportunity to improve their knowledge and skills through academic, occupation and leisuretime activities. All institutions, except satellite camps, detention centers and metropolitan correctional centers, shall operate a full range of activities as outlined in this rule.]

OPI: FPI

5350.27 NUMBER: 7/27/99 DATE:

SUBJECT: Inmate Manuscripts

1. PURPOSE and SCOPE. To encourage inmates to use their leisure time for creative writing and to permit the direct mailing of all

manuscripts as ordinary correspondence.

- 6. [DEFINITION. §551.80. As used in this rule, "manuscript" means fiction, nonfiction, poetry, music and lyrics, drawings and cartoons, and other writings of a similar nature.
- 7. [MANUSCRIPT PREPARATION §551.81. An inmate may prepare a manuscript for private use or for publication while in custody without staff approval. The inmate may use only non-work time to prepare a manuscript.]

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Chapter 5. SPECIAL TRUST FUND SERVICES

5.1 GENERAL

Copier, washer/dryer, and photography services for the inmate population may be operated in the institution at the <u>Warden's discretion</u> under the Trust Fund Program. These services are conducted using sound management practices and have necessary internal controls to ensure that the Trust Fund recognizes all sales, commissions, or other revenue and that waste, fraud, and abuse are minimized.

Copier and washer/dryer services operate with a coinless card system. The inmate photo service uses the TRUFACS-generated photo voucher.

Annually, the Trust Fund Supervisor reviews the internal operation to determine whether an adjustment in price is necessary to keep it viable. This written evaluation contains the type of service, associated costs, and price. The Trust Fund Supervisor forwards a copy to the Trust Fund Branch with the annual Trust Fund budget request.

5.2 INMATE COPIER SERVICE

Copier service is provided by an outside contractor that allows an inmate to purchase copy services. The contractor may provide a special copy card for sale in the Commissary. The card's cost is negotiated with the contractor and marked up as a regular inventory item in TRUFACS.

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- b. <u>Special Trust Fund Services</u>. These procedures may be addressed in a Special Services Institution Supplement or as a component of a consolidated supplement on Trust Fund Operations specifying Special Services Operations. At a minimum the following is addressed:
- (1) Before initiating any service operations, an Institution Supplement detailing local regulations and systems of internal control is developed. The following topics are detailed in the Supplement for each service operation:

Person(s) responsible for each Trust Fund service operation.

Method of operation (e.g., outside contractor or internal operation).

Document 3

Type of service offered.

Location of equipment (e.g., Unit 4, first floor) and type of service.

Method(s) of separation of duties between contractor and institution personnel to ensure amounts due to the Trust Fund are received, verified, and properly recorded.

Internal controls established for accountability of usage from the equipment.

Arrangements for contractor escorts, if applicable.

Disciplinary actions for damage of service equipment or attempts to obtain service without payment.

Method of determining the price of the service.

General procedures regarding the service.

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Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 33 of 213 PageID 36 28 CFR § 543.11 Legal research and preparation of legal documents

- (a) The Warden shall make materials in the inmate law library available whenever practical, including evening and weekend hours. The Warden shall allow an inmate a reasonable amount of time, ordinarily during the inmate's leisure time (that is, when the inmate is not participating in a scheduled program or work assignment), to do legal research and to prepare legal documents. Where practical, the Warden shall allow preparation of documents in living quarters during an inmate's leisure time.
- (b) The Warden shall periodically ensure that materials in each inmate law library are kept intact and that lost or damaged materials are replaced.
- (c) Staff shall advise an inmate of rules and local procedures governing use of the inmate law library. Unauthorized possession of library materials by an inmate constitutes a prohibited act, generally warranting disciplinary action (see part 541 of this chapter).
- (d) An inmate's legal materials include but are not limited to the inmate's pleadings and documents (such as a presentence report) that have been filed in court or with another judicial or administrative body, drafts of pleadings to be submitted by the inmate to a court or with other judicial or administrative body which contain the inmate's name and/or case caption prominently displayed on the first page, documents pertaining to an inmate's administrative case, photocopies of legal reference materials, and legal reference materials which are not available in the institution main law library (or basic law library in a satellite camp).
- (1) An inmate may solicit or purchase legal materials from outside the institution. The inmate may receive the legal materials in accordance with the provisions on incoming publications or correspondence (see 28 CFR part 540, subparts B and F) or through an authorized attorney visit from a retained attorney. The legal materials are subject to inspection and may be read or copied unless they are received through an authorized attorney visit from a retained attorney or are properly sent as special mail (for example, mail from a court or from an attorney), in which case they may be inspected for contraband or for the purpose of verifying that the mail qualifies as special mail.
- (2) Staff may allow an inmate to possess those legal materials which are necessary for the inmate's own legal actions. Staff may also allow an inmate to possess the legal materials of another inmate subject to the limitations of paragraph (f)(2) of this section. The Warden may limit the amount of legal materials an inmate may accumulate for security or housekeeping reasons.
- (e) An inmate is responsible for submitting his documents to court. Institution staff who are authorized to administer oaths shall be available to provide necessary witnessing of these documents, as requested by inmates and at times scheduled by staff.
- (f)
 (1) Except as provided for in paragraph (f)(4) of this section, an inmate may assist another inmate in the same institution during his or her leisure time (as defined

Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 34 of 213 PageID 37 in paragraph (a) of this section) with legal research and the preparation of legal documents for submission to a court or other judicial body.

- (2) Except as provided for in paragraph (f)(4) of this section, an inmate may possess another inmate's legal materials while assisting the other inmate in the institution's main law library and in another location if the Warden so designates.
- (i) The assisting inmate may not remove another inmate's legal materials, including copies of the legal materials, from the law library or other designated location. An assisting inmate is permitted to make handwritten notes and to remove those notes from the library or other designated location if the notes do not contain a case caption or document title or the name(s) of any inmate(s). The assisting inmate may also develop and possess handwritten drafts of pleadings, so long as the draft pleadings do not contain a case caption or document title or the name(s) of any inmate(s). These notes and drafts are not considered to be the assisting inmate's legal property, and when the assisting inmate has these documents outside the law library or other designated location, they are subject to the property limitations in § 553.11(a) of this chapter.
- (ii) Although the inmate being assisted need not remain present in the law library or other designated location while the assistance is being rendered, that inmate is responsible for providing and retrieving his or her legal materials from the library or other designated location. Ordinarily, the inmate must provide and retrieve his or her legal materials during his or her leisure time. An inmate with an imminent court deadline may request a brief absence from a scheduled program or work assignment in order to provide or retrieve legal materials from an assisting inmate.
- (3) The Warden may give special consideration to the legal needs of inmates in mental health seclusion status in federal medical centers or to inmates in controlled housing.
- (4) The Warden at any institution may impose limitations on an inmate's assistance to another inmate in the interest of institution security, good order, or discipline.
- (g) The institution staff shall, upon an inmate's request and at times scheduled by staff, duplicate legal documents if the inmate demonstrates that more than one copy must be submitted to court and that the duplication cannot be accomplished by use of carbon paper. The inmate shall bear the cost, and the duplication shall be done so as not to interfere with regular institution operations. Staff may waive the cost if the inmate is without funds or if the material to be duplicated is minimal, and the inmate's requests for duplication are not large or excessive.
- (h) Unless clearly impractical, the Warden shall allow an inmate preparing legal documents to use a typewriter, or, if the inmate cannot type, to have another inmate type his documents. The Warden may allow the inmate to hire a public stenographer to type documents outside the institution, but the institution may not assume the expense of hiring the public stenographer. Staff shall advise the inmate of any delay in the typing of which they have received notice from the stenographer.

- Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 35 of 213 PageID 38
- (i) The Warden shall give special time allowance for research and preparation of documents to an inmate who demonstrates a requirement to meet an imminent court deadline. Otherwise, each inmate shall continue his regular institutional activities without undue disruption by legal activities.
- (j) With consideration of the needs of other inmates and the availability of staff and other resources, the Warden shall provide an inmate confined in disciplinary segregation or administrative detention a means of access to legal materials, along with an opportunity to prepare legal documents. The Warden shall allow an inmate in segregation or detention a reasonable amount of personal legal materials. In no case shall the amount of personal legal materials be such as to pose a fire, sanitation, security, or housekeeping hazard.

[44 FR 38263, June 29, 1979, as amended at 62 FR 4893, Jan. 31, 1997

28 CFR § 544.21 - Procedures

- (a) The Warden or designee must appoint a postsecondary education coordinator (ordinarily an education staff member) for the institution. The postsecondary education coordinator is responsible for coordinating the institution's postsecondary education program.
- **(b)** An inmate who wishes to participate in a postsecondary education course must apply through the postsecondary education coordinator. If the postsecondary education coordinator determines that the course is appropriate in light of the institution's need for discipline, security, and good order, the inmate may enroll provided that:
- (1) The inmate meets eligibility requirements for the course which have been set by the course provider,
- (2) The inmate is responsible for payment of any tuition either through personal funds, community resources, or scholarships available to the inmate, and
- (3) The unit team determines that the course is appropriate for the inmate's apparent needs.

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Exhibit C

Public Postings



PageID 41

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville, Texas

Office of the Warden

February 26, 2024

MEMORANDUM FOR INMATE POPULATION SEAGOVILLE, TEXAS

FROM:

Dr. S. Grant, Warden

Federal Correctional Institution, Seagoville

SUBJECT:

Executive Introduction & Expectations

Let me start by saying thank you for the warm welcome and it is an honor and privilege to be a part of the FCI Seagoville Team. I look forward to working with each one of you in achieving your programming goals.

As your Warden, I am committed to providing a safe and orderly environment for both staff and adults in custody at FCI Seagoville. Unfortunately, there are some incarcerated offenders who continue to engage in behavior which negatively impacts everyone. These behaviors, which include drone contraband introductions, homemade intoxicants, weapons, damaging the ceilings, walls, as well as destroying equipment and property, will not be tolerated. If your unit continues to be involved in this misconduct it will result in the entire unit's loss of commissary sales, visitation, telephone, and Trulincs.

Therefore, I strongly encourage each of you to use your time at this facility in the most positive, and productive manner possible. Enroll in GED, college courses, faith-based courses, drug treatment, vocational training, and obtain a job. The entire Executive Staff will continue to conduct rounds and communicate to keep you abreast of any changes. Thank You

7.1

Dr. S. Grant, Warden



Federal Bureau of Prisons

Federal Correctional Institution

Seagoville, TX 75159

June 13, 2023

MEMORANDUM FOR INMATE POPULATION

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Law Library Typewriters - Typewriter Wheels

Typewriter wheels will no longer be stored in the typewriters. Your identification card will be required to check out typewriter wheels. You will receive your ID card back upon successfully returning the undamaged typewriter wheel. Wheels should be checked back in with the clerk when you are not actively utilizing the typewriter and during any moves in which you are not physical at the typewriter kiosk.

Any damage to a typewriter and/or wheel may result in an Incident Report (Code 218/329).

Any inmate using the typewriter in the Law Library for typing any material(s) other than legal paperwork may be subject to an Incident Report (Code 307).

This is the only place where the typewriters are available to FCI-seagoville inmater and there has never been an instance where I have seen that every typewriter was being used due to the abundant quantity of typewriters and SOE Howard's restrictions.

Document 3



Inmate Copier Policies and Procedures

THIS COPY MACHINE IS FOR LEGAL COPIES ONLY ESTA COPIADORA ES PARA COPIAS LEGALES SOLAMENTE

PROHIBITED ACTS:

- Documents which list another inmate's name or number may NOT be copied and may be confiscated and treated as nuisance contraband.
- Special circumstances may be approved by the Supervisor of Education.
- Documents can only be duplicated by the inmate whose name and register number appear on the
 document and whose ownership can be verified.
- · Copy cards may be purchased at commissary. Each inmate must purchase and use their own card.

ACTOS PROHIBIDOS:

- Los documentos que enumeran el nombre o el número de otro preso NO pueden ser copiados y pueden ser confiscados y tratados como contrabando molesto.
- Las circunstancias especiales pueden ser aprobadas por el Supervisor de Educación.
- Los documentos sólo pueden ser duplicados por el recluso cuyo nombre y número de registro aparecen en el documento y cuya propiedad puede ser verificada.
- · Las copias se pueden comprar en el comisario. Cada recluso debe comprar y usar su propia tarjeta.

ALL DOCUMENTS that are copied on the inmate copy machine may be screened by staff at any time. A Clerk is available if assistance is needed with the duplication process.

TODOS LOS DOCUMENTOS que se copian en la copiadora del preso pueden ser examinados por el personal en cualquier momento. Un empleado está disponible si se necesita ayuda con el proceso de duplicación.

The institution staff shall, upon an inmate's request and at times scheduled by staff, duplicate legal documents if the inmate demonstrates that more than one copy must be submitted to court and that the duplication cannot be accomplished by use of carbon paper. The inmate shall bear the cost, and the duplication shall be done so as not to interfere with regular institution operations. Staff may waive the cost if the inmate is without funds or if the material to be duplicated is minimal, and the inmate's requests for duplication are not large or excessive. (PS 1315.07)

Cuando un reo lo solicita y en el horario durante el cual el personal lo programa, el personal de la institución reproducirá los documentos legales si el reo comprueba de que más de una copia debe ser presentada al tribunal y que la reproducción de tal no se puede lograr usando el papel carbón. El reo asumirá los costos, y la reproducción se hará de manera que no interfiera con las operaciones normales de la institución. El personal puede suspender los costos si el reo no tiene los fondos o si el material a ser reproducido es mínimo y las solicitudes para reproducción no son grandes o excesivas.



Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

August 30, 2023

MEMORANDUM FOR INMATE POPULATION

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Inmate Legal Copier

aral Boresa at 16

The inmate legal copy machine has been relocated to the lobby area near the Department Main Entrance. The copier will be available to the inmate population during the following days/times:

Before this shedule was posted innates could vice the Court of the law library

Monday 7:00 am - 8:00 am

Wednesday 9:20 am - 10:20 am

Thursday 5:50 pm - 6:50 pm

Friday 12:15 pm - 1:15 pm

Saturday 11:50 am - 12:50 pm

Please see an Education Department staff member if you are requesting immediate assistance. Proof of imminent due date to the courts will be required for assistance outside of normal copy hours.

Please see Mr. Pharaoh or Ms. Bullock if you need:

> Copies of a court legal form template

> Copies in excess of 50 pages

> Request for an alternate day or time

> Any additional assistance or questions

**Hours and availability are subject to change without notice due to the needs of the institution

Speckelly consider Weeknight and Blood fron Center Contra "make up Case 3:24-03148-X-BW Document 3 Filed 12/13/24 Page 42 of 213 PageID 45

U.S. Department of Justice

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

September 30, 2022

MEMORANDUM FOR: FCI Inmate Population

1/s//

FROM:

V. Caldwell, Supervisor of Education

SUBJECT:

Education Schedule- GREEN Level Operations

Effective October 3-8, 2022, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to follow this schedule based on their designated housing unit group. Moves will be made during controlled movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- · Education work detail will report daily during work call.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items will be confiscated.
- Appropriate attire <u>must</u> be worn at all times.

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	Oct 3	Oct 4	Oct 5	Oct 6	Oct 7	Oct 8
Day	GED/ESL	GED/ESL	GED/ESL	GED/ESL	GED/ESL	Library
7:20 AM-	Career Ctr	Career Ctr	Career Ctr	Career Ctr	Career Ctr	
2:50 PM	Library	Library	Library	Library	Library	
Evening 5:50 PM-	Group A 5/12/53	Group B 6/7/54	Group A 5/12/53	Group B 6/7/54	CLOSED	CLOSED
7:50 PM	FSA Library	FSA Library	FSA Library	FSA Library		

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U.S. Department of Justice

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

March 3, 2023

MEMORANDUM FOR: FCI Inmate Population

1/5//

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Education Schedule - GREEN Level Operations

Effective March 6 - March 11, 2023, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- · Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- · Appropriate attire must be worn at all times.

	Monday Mar 6	Tuesday Mar 7	Wednesday Mar 8	Thursday Mar 9	Friday Mar 10	Saturday Mar 11
Day 7:20 AM- 2:50 PM	GED/ESL Career Ctr Library	Library 7:30-3:30				
Evening 5:50 PM- 7:50 PM	CLOSED	FSA/ACE/RPP Library	CLOSED	CLOSED	CLOSED	CLOSED

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U.S. Department of Justice

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

March 10, 2023

MEMORANDUM FOR: FCI Inmate Population

//s//

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Education Schedule - GREEN Level Operations

Effective March 13 - March 18, 2023, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- · Appropriate attire must be worn at all times.

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	Mar 13	Mar 14	Mar 15	Mar 16	Mar 17	Mar 18
Day	GED/ESL	GED/ESL	GED/ESL	GED/ESL	GED/ESL	CLOSED
7:20 AM-	Career Ctr	Career Ctr	Career Ctr	Career Ctr	Career Ctr	
2:50 PM	Library	Library	Library	Library	Library	
Evening 5:50 PM- 7:50 PM	FSA/ACE/RPP Library	FSA/ACE/RPP Library	CLOSED	FSA/ACE/RPP Library	CLOSED	CLOSED

Case 3:2476-03148-X-BW Document 3 Filed 12/13/24 Page 45 of 213 PageID 48

U.S. Department of Justice

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

March 13, 2023

MEMORANDUM FOR: FCI Inmate Population

1/s//

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Education Schedule - GREEN Level Operations

Effective March 13 - March 18, 2023, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- · Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- Appropriate attire <u>must</u> be worn at all times.

	Monday Mar 13	Tuesday Mar 14	Wednesday Mar 15	Thursday Mar 16	Friday Mar 17	Saturday Mar 18
Day 7:20 AM- 2:50 PM	GED/ESL Career Ctr Library	Library 7:30-3:30				
Evening 5:50 PM- 7:50 PM	FSA/ACE/RPP Library	FSA/ACE/RPP Library	CLOSED	FSA/ACE/RPP Library	CLOSED	CLOSED

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

April 3, 2023

MEMORANDUM FOR: FCI Inmate Population

1/5//

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Education Schedule - GREEN Level Operations

Effective April 3 - April 8, 2023, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- · Appropriate attire must be worn at all times.

	Monday Apr 3	Tuesday Apr 4	Wednesday Apr 5	Thursday Apr 6	Friday Apr 7	Saturday Apr 8
7:20 AM- 2:50 PM	GED/ESL Career Ctr Library	Library 7:30-3:30				
Evening 5:50 PM- 7:50 PM	FSA/ACE/RPP Library	FSA/ACE/RPP Library	CLOSED	CLOSED	CLOSED	7.30-3.30

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Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

April 10, 2023

MEMORANDUM FOR: FCI Inmate Population

1/s//

FROM: L. Howard, Supervisor of Education

SUBJECT: Education Schedule - GREEN Level Operations

Effective April 10 - April 15, 2023, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- · Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- · Appropriate attire must be worn at all times.

	Monday Apr 10	Tuesday Apr 11	Wednesday Apr 12	Thursday Apr 13	Friday Apr 14	Saturday Apr 15
7:20 AM- 2:50 PM	GED/ESL Career Ctr Library	Library 7:30-3:30				
Evening 5:50 PM- 7:50 PM	FSA/ACE/RPP Library	FSA/ACE/RPP Library	CLOSED	FSA/ACE/RPP Library	CLOSED	7:30-3:30

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U.S. Department of Justice

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

April 14, 2023

MEMORANDUM FOR: FCI Inmate Population

1/s//

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Education Schedule - GREEN Level Operations

Effective April 17 - April 22, 2023, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- · Appropriate attire must be worn at all times.

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	Apr 17	Apr 18	Apr 19	Apr 20	Apr 21	Apr 22
Day	GED/ESL	GED/ESL	GED/ESL	GED/ESL	GED/ESL	Library
7:20 AM-	Career Ctr	Career Ctr	Career Ctr	Career Ctr	Career Ctr	
2:50 PM	Library	Library	Library	Library	Library	
Evening 5:50 PM- 7:50 PM	FSA/ACE/RPP Library	FSA/ACE/RPP Library	CLOSED	CLOSED	CLOSED	7:30-3:30

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U.S. Department of Justice

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

May 30, 2023

MEMORANDUM FOR: FCI Inmate Population

1/s//

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Education Schedule - GREEN Level Operations

Effective May 29 - June 3, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- · Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- Appropriate attire must be worn at all times.

	Monday May 29	Tuesday May 30	Wednesday May 31	Thursday June 1	Friday June 2	Saturday June 3
Day 7:20 AM- 2:50 PM	CLOSED HOLIDAY	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	Library -7:30-3:3
Evening 5:50 PM- 7:50 PM	CLOSED HOLIDAY	CLOSED	CLOSED	CLOSED	CLOSED	closed: no state

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

June 12, 2023

MEMORANDUM FOR: FCI Inmate Population

1/s//

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Education Schedule - GREEN Level Operations

Effective June 12 - June 17, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- · Appropriate attire must be worn at all times.

	Monday June 12	Tuesday June 13	Wednesday June 14	Thursday June 15	Friday June 16	Saturday June 17
7:20 AM- 2:50 PM	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	Carer Ctr Library Closed for Search	GED/ESL Career Ctr Library	CLOSED
Evening 5:50 PM- 7:50 PM	FSA/ACE/RPP Library	FSA/ACE/RPP Library	CLOSED	FSA/ACE/RPP Library	CLOSED	CLOSED



Federal Bureau of Prisons

Federal Correctional Institution

Seagoville, TX 75159

June 13, 2023

MEMORANDUM FOR INMATE POPULATION

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Law Library Typewriters

Any inmate using the typewriter in the Law Library for typing any material(s) other than legal paperwork may be subject to an Incident Report (Code 307).

Subjecto: Todos Los Que Consierne

Cualquier recluso con la máquina de escribir en la Biblioteca de Derecho escribiendo cualquier material (s) mas que trámites legales puede ser subjectado a un reporte de incidete (código 307).

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

July 1, 2023

MEMORANDUM FOR: FCI Inmate Population

1/5//

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Education Schedule

Effective **July 3 - July 8**, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- · Appropriate attire must be worn at all times.

	Monday July 3	Tuesday July 4	Wednesday July 5	Thursday July 6	Friday July 7	Saturday July 8
Day 7:20 AM- 2:50 PM	GED/ESL Career Ctr Library	CLOSED HOLIDAY	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	Library
Evening 5:50 PM- 7:50 PM	CLOSED	CLOSED HOLIDAY	CLOSED	CLOSED	CLOSED	7:30-3:30

^{**}The Dept will be closed during evening hours this week due to staff availability

Case 3 9 93148-X-BW

U.S. Department of Justice

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

July 9, 2023

MEMORANDUM FOR: FCI Inmate Population

1/s//

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Education Schedule

Effective July 9 - July 14, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- · Appropriate attire must be worn at all times.

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	July 9	July 10	July 11	July 12	July 13	July 14
Day	GED/ESL	GED/ESL	GED/ESL	GED/ESL	GED/ESL	Library
7:20 AM-	Career Ctr	Career Ctr	Career Ctr	Career Ctr	Career Ctr	
2:50 PM	Library	Library	Library	Library	Library	
Evening 5:50 PM- 7:50 PM	CLOSED	FSA/ACE/RPP Library	CLOSED	FSA/ACE/RPP Library Closed 6:50	CLOSED	Library 7:30-3:30

^{**}Evening hours posted reflect staff availability

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

July 17, 2023

MEMORANDUM FOR: FCI Inmate Population

1/s//

FROM: L. Howard, Supervisor of Education

SUBJECT: Education Schedule

Effective July 17 - July 22, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- · Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- · Appropriate attire must be worn at all times.

	Monday July 17	Tuesday July 18	Wednesday July 19	Thursday July 20	Friday July 21	Saturday July 22
7:20 AM- 2:50 PM	GED/ESL Career Ctr Library	Library				
Evening 5:50 PM- 7:50 PM	CLOSED	CLOSED	CLOSED	FSA/ACE/RPP Library	CLOSED	7:30-3:30

^{**}Evening hours posted reflect staff availability

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

July 24, 2023

MEMORANDUM FOR: FCI Inmate Population

1/s//

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Education Schedule

Effective July 24 - July 29, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- Appropriate attire <u>must</u> be worn at all times.

				1. 4		
	Monday July 24	Tuesday July 25	Wednesday July 26	Thursday July 27	Friday July 28	Saturday July 29
7:20 AM- 2:50 PM	GED/ESL Career Ctr Library	Library				
Evening 5:50 PM- 7:50 PM	CLOSED	CLOSED	CLOSED	FSA/ACE/RPP Library	CLOSED	7:30-3:30

^{**}Evening hours posted reflect staff availability

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

July 31, 2023

MEMORANDUM FOR: FCI Inmate Population

1/s//

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Education Schedule

Effective July 31 - August 5, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- · Appropriate attire must be worn at all times.

	Monday July 31	Tuesday Aug 1	Wednesday Aug 2	Thursday Aug 3	Friday Aug 4	Saturday Aug 5
7:20 AM- 2:50 PM	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library 12:50 -2:50	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	Library
Evening 5:50 PM- 7:50 PM	FSA/ACE/RPP Library	CLOSED	CLOSED	FSA/ACE/RPP Library	CLOSED	7:30-3:30

^{**}Evening hours posted reflect staff availability

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

September 4, 2023

MEMORANDUM FOR: FCI Inmate Population

1/5//

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Education Schedule

Effective September 4 - September 9, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- · Appropriate attire must be worn at all times.

	Monday Sept 4	Tuesday Sept 5	Wednesday Sept 6	Thursday Sept 7	Friday Sept 8	Saturday Sept 9
7:20 AM- 2:50 PM	CLOSED HOLIDAY	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	Library
Evening 5:50 PM- 7:50 PM	CLOSED	CLOSED	ACE/RPP Library	CLOSED	CLOSED	7:30-3:30

^{**}Evening copy hours will be held on Wednesday, Sept. 6 from 5:50 pm - 6:50 pm

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Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

September 12, 2023

MEMORANDUM FOR FCI INMATE POPULATION

1/s//

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Education Schedule

Modified Evening Operating Hours

Effective September 12, 2023, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Programming and library services are available during evening watch, Tuesday only.
- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- · Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- · Appropriate attire must be worn at all times.

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Day 7:20 AM- 2:50 PM	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library Close 1:10pm	GED/ESL Career Ctr Library closed 1:10pm	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	Library
Evening 5:50 PM- 7:50 PM	CLOSED	ACE/RPP Library	CLOSED	CLOSED	CLOSED	7:30-3:30

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Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

October 17, 2023

MEMORANDUM FOR: FCI Inmate Population

//s//

FROM: L. Howard, Supervisor of Education

SUBJECT: Education Schedule Change

Library and Programming Hours

Effective October 30, 2023, the Education Department will implement the following schedule change for library services, GED/ESL classes and FSA programming. This is determined by institutional level of operations, and is subject to change.

Leisure & Law Libraries will be open during the following times:

Monday - Friday 7:00 am - 10:30 am ♦ 12:00 pm - 2:50 pm 5:50 pm - 7:50 pm during scheduled late night operations

> Saturday 7:15 am - 3:15 pm

GED (English/Spanish), ESL and SLN classes will be held at:

7:00 am - 8:30 am	GED, GED (Sp), SLN, ESL
8:30 am - 10:30 am	GED, GED (Sp), SLN, ESL
12:50 pm - 2:50 pm	GED, GED (Sp), SLN, ESL

The Education Department (inc. Barber Shop) will be CLOSED

Monday - Friday from 10:30 am - 12:00 pm

All inamtes will return to their housing units at the 10:30 am recall move and will procede to mainline with their units.

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Education Department Announcements & Updates

THE EDUCATION DEPT.

Will operate on the following modified schedule: weeks of November 13 - 25

	Monday 11/13	Tuesday 11/14	Wednesday 11/15	Thursday 11/16	Friday 11/17	Saturday 11/18
7:20 AM- 2:50 PM	GED/ESL Career Ctr Library	CLOSED				
Evening 5:50 PM- 7:50 PM	CLOSED	ACE/RPP Library	CLOSED	CLOSED	CLOSED	

	Monday 11/20	Tuesday 11/21	Wednesday 11/22	Thursday 11/23	Friday 11/24	Saturday 11/25
Day 7:20 AM- 2:50 PM	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	CLOSED	CLOSED	CLOSED
Evening 5:50 PM- 7:50 PM	CLOSED	ACE/RPP Library	CLOSED	Tha	nksgir	rings

L. Howard/SOE

FREDRICKSOMETHACTHY 22005020

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Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

July 17, 2024

MEMORANDUM FOR FCI Inmate Population

//s//

FROM: L. Howard, Supervisor of Education

SUBJECT: Education Schedule

Effective July 22, 2024, the Education Department will implement the following schedule and guidelines for all education and library services. This is determined by institutional level of operations, and is subject to change.

- Inmates are expected to move only during compound movement; any unauthorized inmate found in Education will be considered Out of Bounds.
- Education work detail will report daily during work call AM/PM.
- GED/ESL/FSA/ACE/VT enrolled students are required to report to class promptly. Attendance will be taken for credit.
- Only materials related to education courses or legal work are allowed in the Education Department. Items are subject to search. Prohibited items and contraband will be confiscated and may be subject to disciplinary action.
- · Appropriate attire must be worn at all times.

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
7:00 AM- 2:50 PM	GED/ESL Career Ctr Library	Library				
Evening 5:50 PM- 7:50 PM	ACE/RPP Library	ACE/RPP Library	ACE/RPP Library	ACE/RPP Library	CLOSED	7:00-3:0

Notice to Inmate Population



NO late-night services for Education on the following dates:

Tuesday, 8/20/2024

Tuesday, 8/27/2024

EDUCATION CLOSURE



NO LATE NIGHT!!!!

Tuesday 10/01/2024

Tuesday 10/15/2024

Tuesday 10/22/2024

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

November 7, 2024

MEMORANDUM FOR FCI INMATE POPULATION

1/s//

FROM: L. Howard, Supervisor of Education

SUBJECT: Operating Schedule - Modification

The Education Department and libraries will be operating on the following modified schedule. We will return to normal operations on Tuesday, November 12, 2024.

	Thursday 11/7	Friday 11/8	Saturday 11/9	Monday 11/11
Day 7:00 AM- 2:50 PM	GED/ESL Career Ctr Library	GED/ESL Career Ctr Library	CLOSED	CLOSED
Evening 5:50 PM- 7:50 PM	CLOSED	CLOSED	CHOOLD	VETERAN'S DAY

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville Texas 75159

November 15, 2024

MEMORANDUM FOR ADULTS IN CUSTODY POPULATION

FROM:

M. James, Education Technician

SUBJECT:

Legal Copy Access

Effective Monday, November 18, 2024, the Education Department will implement the following schedule change for requesting copies via the inmate legal copy machine.

Monday	12:00	pm -	12:20	pm
Tuesday	12:00	pm -	12:20	pm
Wednesday	10:00	am -	- 10:20	am
Thursday	10:00	am -	10:20	am
Friday	10:00	am -	10:20	am
Saturday	9:00	am -	9:20	am

Please contact Mr. James if you need:					
> Copies of a court legal form template	> Copies in excess of 50 pages				
> Request for an alternate day or time	> Any additional assistance or questions				

^{**}Hours and availability are subject to change without notice due to the needs of the institution

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville, Texas 75159

November 25, 2024

MEMORANDUM FOR ADULTS IN CUSTODY POPULATION

//s//

FROM: L. Howard, Supervisor of Education

SUBJECT: Thanksgiving 2024 Operating Hours

Please be advised the Education Department will be closed on Thursday, November 28, 2024, and Friday, November 29, 2024. Regular scheduled operating hours will resume on Saturday, November 30, 2024.

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville, Texas 75159

December 3, 2024

MEMORANDUM FOR ADULTS IN CUSTODY POPULATION

FROM:

L. Howard, Supervisor of Education

SUBJECT:

Late Night Schedule Modification

Please be advised the Education Department will be closed Tuesday, December 3, 2024, from 5:50 pm to 7:50 pm. Regularly scheduled operating hours will resume on Wednesday, December 4, 2024.

Exhibit D

General Exhibits

American Prison Writing Archive Page 69path 211 Biver Bage ID 72 3400 N. Charles St. Baltimore, MD 21218

October 22, 2024

Dear Mr. Morris,

Hello from the American Prison Writing Archive. We are writing to you today in response to correspondence sent to us dated August 23, 2024. We hope this letter finds you well.

We were so thrilled and impressed to receive the June and July issues of the Bars & Stripes Newsletter. This is an incredible work of artistry, knowledge, and determination. Thank you so much for sharing it with us. It was so enjoyable to read a bit about the beginnings of this newsletter and enjoy the writings of contributors. Beyond that, it was a great surprise and so impressive to see the work that went into the translations of the historical documents that were found. This newsletter and the work that you and others have put into it are truly incredible. I hope you're as proud and impressed with yourselves as we were reading it.

We understand that the status of the Bars & Stripes is currently up in the air. We're sorry to hear that support of your work is not certain. We can see how valuable and important this newsletter is, not just currently, but also within a historical lineage of people coming together in confinement to share and spread news and well wishes. We will happily do our best to share your newsletter with other organizations. We believe it is worth sharing.

As for acceptance into the Archive, the APWA does not usually accept work of this kind. Newsletters fall outside of the scope of essays and poems which are our standard submissions. Because many different people contributed to the newsletter, and it contains historical documents, we may not be able to post this to our website because of privacy and permissions concerns. However, we definitely see the value in this work and want to think through how we might be able to preserve or share it. If you'd let us hold onto these issues without immediately knowing how we can share them, we'd be happy to think through next steps.

In order to consider posting to our website, we do ask that all contributors send us a permissions questionnaire form. Because these newsletters have been contributed to, whether through writing, art work, or otherwise, by multiple people, we would ask for contributors to sign and return permissions forms. If possible, we'd ask for signed PQs from Robert Williams, Erik Miltonhall, and anyone else who contributed to or helped participate in the creation of these two issues. We understand this may be difficult, but again, we do require signed consent from all contributors.

After receiving these PQs we may be able to consider posting these issues to our site with potential redactions.

Regardless of whether this might go on our website, we're so thrilled to have received and seen these pieces, and we'd like to continue spreading the word with other organizations.

Please feel free to follow up with any questions or concerns. Again, we are so impressed and excited with the work you are creating with Bars & Stripes, and we hope you are able to continue to create important newsletters moving forward.

Thank you for sharing in your talents.

Sincerely,

The Staff American Prison Writing Archive



P.O. Box 12276 Austin, Texas 78711-2276 512-463-6100 thc.texas.gov

Document 3

August 13, 2024

Randall Morris, #15141010 Federal Correctional Institution P.O. Box 9000 Seagoville, TX 75159-9000

Mr. Morris,

Based on your letter of July 13, 2024, it is apparent that you did not receive my response to your letter dated July 18, 2023. Not sure what happened there. I also did not receive your letter from April of this year. In my note last year, I stated that I was aware that there had been a camp newsletter, as they were quite common across many of the camps, but that I had no specific information in my program files about the one at Seagoville. I had also enclosed a copy of the brochure the THC published on the camp at Seagoville.

I appreciate the copy of your recent newsletter and the time and effort that you have invested in translating the camp newsletter. It is great that you were able to collect so many copies of the original camp newsletter. I recently ran across some documents that one of my predecessors found on a research trip to the National Archives which you might find to be interesting material for your newsletter, enclosed.

Again, I'm not sure what happened with our earlier efforts at communication, but I hope this letter and enclosures reach you and that you find them useful.

Best wishes,

Stephen Cure

Military/Oral History Program Coordinator

Ircspuded 8/19/24

Webb Hunter LLC P.O. Box 363 Christiansburg, VA 24068





Invoice date 10/4/2024 Invoice

Invoice number 1375

Morris, Randall #15141010 FCI P.O. Box 9000 Seagoville, TX 75159-9000

Educational Research (Chernobyl Area of Effect)

Code	Description	Qty	Unit price	Amount
Postage, Envelope	USPS postage: Forever + Extra Ounce		1.01	1.01
Research, Educational	Per subject researched	1	6.00	6.00
Results Page, B&W	Per B&W page printed	8	0.25	2.00
			Total	\$ 9.01
	Less: Receip	t — 26800581907 —	9/28/2024	\$ 9.01
		В	alance due	\$ 0.00

Remaining Account Balance:

76.78

Updates:

NEW SERVICE:

Need help expressing yourself clearly? I now offer an "A.I. Writing" service to craft confident communication for any occasion -letters, professional outreach, or essential documents like parole board statements or impact responses. Just provide your needs and key details to fine-tune the A.I. results. Ideal for documents up to 5 pages. \$6 per document + \$0.25 per page.

You can also request A.I.-generated summaries for Educational Research projects, offering a broad overview from multiple sources. Keep in mind, A.I. may not always be 100% accurate.

NEW POLICY:

Due to their unreliability, I'll only purchase from third-party Amazon vendors if you authorize it in your request, with NO REFUNDS for canceled orders, including inventory or shipping issues.

IMPORTANT NOTICE:

Due to increased advertising costs by Prison Legal News (PO Box 1151, Lake Worth, FL 33460), I can no longer advertise in their monthly periodical, limiting my reach to new customers. Please share Webb Hunter with others and consider writing to PLN about their higher rates, which have cut the number of advertisers to just one-third of what it was in 2022. That's a twothirds decrease in support for people like you nationwide!

REFERRAL PROGRAM:

As a thank you for your support, I've launched a referral program: Refer someone who requests a brochure as a NEW customer, and if they mention your name, I'll log that referral. After 10 referrals, you'll unlock a 50% off coupon (up to \$10). Coupons can't be combined with other offers, and only original coupons are accepted (no photocopies).

Case 3:24-cv-03148-X-BM SALES INVOICEPersonal Inmate Information Seagoville FCI MAIN ACCOUNT No. 15141010 TF24603 MARIS, RANDALL ALLEN 10/03/23 Time 08:18:55 TX ID 7002883 Receipt# 4 BEGINNING BALANCES: Available Balance is N/A Spending Limit Balance is N/A			Seagoville FCI MAIN Account No. 15141010 TF23527 MORRIS, RANDALL ALLEN 05/16/2023/01:21:19 PM TX#6940250 60		Page 72 of 213 PageID 75 SALES INVOICE Personal Inmate Information Seagoville FCI MAIN ACCOUNT No. 13604040 TF48430 WARNER, ADELBERT HAROLD II 07/07/21 Time 08:45:12 TX ID 6618761		
			Available Balance is \$360.00 Spending Limit Balance is \$360.00 Account Balance is \$360.00		Receipt# 46 BEGINNING BALANCES: Available Balance is N/A Spending Limit Balance is N/A		
-	nt Balance is		_ Oty Description	Price	Accoun	t Balance is	
QTY	DESCRIPTION	PRICE	= 1 NESTLE ICE CREAM	\$2.95	QTY	DESCRIPTION	PRICE
2	ALLSTARS 24CS	\$3.10	1 SHORTS 2X 1 FAN 8 INCH - MASS	\$22.10 \$30.70	1	AA BATTERIES 72CS	\$1.40
1	BABY BACK RIB CHIPS 12CS	\$2.70	10 SHRIMP CUP SOUP 1	\$8.00	1	CHI CHI CORN	\$1,20
3	CACTUS ANN TORTILLA	\$8.55	1 T SHIRT 2 XL RUSS 1 CANADA DRY	\$7.15 \$7.50	2	TORTILLAS 12 CS COFFEEMATE CREAMER	64.70
	CHIP 12/CS		24 RAMEN BEEF FLAVOR-	\$12.00	5	COMBO BEEF / CHEESE	\$4.70 \$7.00
1	CHEESE RICE 24CS	\$2.30	2 CACTUS ANN TORTIL 1 PAPA TUB PORK SKI	\$5.70		72CS	37.00
3	CHI CHI FLOUR TORTILLA 12CS	\$10.35	1 BABY BACK RIB CHI	\$2.70	5	ENVELOPES 9*5X12, NO	\$0.75
5	CHICKEN BITES 18CS	\$12.50	TITYPEWRITER RIBBON JENVELOPES 9X5XIZ.	\$15.60	2	CLASP 500	******
1	CHILI 24CS	\$2.10	5 HANGER, CLOTHS 14	\$2.25	2	FOLGERS COFFEE 6CS GOYA 36 CS	\$13.00
8	CHILI CON QUESO	\$16.80	(1) CORRECTION TAPE 6)	\$3.90	2	HOT COCOA 18CS	\$3.20 \$3.20
	SPREAD 24C/S	ale had	1 LORATADINE RELIEF	\$1.65	2	INK PENS/BIC ST799	\$0.30
2	CHOC CHIP COOKIE	\$3.40	1 LORATADINE RELIEF — 1 ANI ALLERGY TABS —	\$1.65 \$1.50	2	MOZZARRELA CHEESE	\$3.60
1	CHORIZO BEANS 24CS	\$2.80	1 ANI NONASPRIN	\$2.45		24CS	
1	COFFEEMATE CREAMER	\$3.10	1 ANI IBUPROFEN 200 T 1 ANI FIBER TABLETS T	\$2.00 \$6.00	6	PECAN TWIRLS	\$5.40
10	COMBO BEEF / CHEESE	\$16.00	1 SOAP DISH NEW 12C -	\$0.70	2	PEPSI 15PK	\$12.40
6	72CS	-	1 ANI ASPRIN 24 CS — 2 INK PENS/BIC ST	\$1.60 \$0.30	1	SNACK CRACKERS 12CS	\$2.40
5	COPY CARD 500CS	(\$32.50)	1 GLASSES 2.25	\$3.90	0	THAI SOUP 24CS TYPEWRITER RIBBONS	\$2.60
(2)	CORRECTION TAPE 6 CS *)	\$1.45	2 PAPA TUB PORK SKI 2 CHOC CHIP COOKIE	\$3.20 \$3.60	0	(#901285)	38.95
2	CUP SOUP SHRIMP 12CS	\$1.60	1 FOLGERS COFFEE &C	\$8.25	3	WHOLE MCKERL	\$3.00
1	DILL PICKLE 12 C/S	\$1.20	1 FOLGERS COFFEE &C 3 ALLSTARS 24CS	\$8.25 \$4.65		24CS/4368 PALLET	
1	GOODY GOODY MIX	53.60	1 COFFEENATE CREAME	\$3.10		# ITEMS SOLD: 41 CHARGE 13604040	- Titale
	24CS		1 COFFEE MATE VANIL 1 MOUTHWASH COOL WA	\$4.75 \$1.50	ENDING	BALANCES:	- Sold Street
1	GRANOLA BLUEBERRY 12 CS	\$4.25	6 CHICKEN BITES 18C	\$15.00		Balance is N/A	
1	HIDDEN VALLEY RANCH	\$0.60	10 TROPICAL SKITTLES 2 SPAN 24CS	\$14.00 \$3.50		Limit Balance is N/A Balance is Wallance	
6	ICED HONEY BUNS 48 CS	\$8,40	1 CORN REMOVER MED	\$2.60	Account	Fingerprint Verified	
3	KING NUT HONEY	\$1.95	2 DOVE 72CS 1 TWEEZERS 36CC	\$5.20 \$0.60	Signature		
333	ROASTED PEANUT		1 DEGREE DEO 12 CS	\$3.85			
1	MELINDAS PERI GARLIC SAUCE	\$4.95	1 BRUSHLESS SHAVE C — 6 SNICKER 384C/S	\$2.60 \$8.40	SALESIA	NVOICEPersonal Inmate Inf	
2	PEPSI 15PK	\$15.00	1 BAND AIDS 12CS -	\$0.90	Seagovill		formation
1	PETER PAN CREAMY	\$2.80	3 DUPLEX CONFETTI C 1 CRACKERS SALTINES ~	\$6.75 \$2.30	MAIN		
	12CS		2 GOODY GOODY MIX -	\$7.20			TF24603
24	CHICKEN 24GS	\$12.00	1 REFRIED BEANS 24C 1 1 CHORIZO BEANS 24 -	\$2.55 \$2.80		R, ADELBERT HAROLD II Time 08:20:03 TX ID	6639306
1	REFRIED BILLINS 24CS	\$2.55	5 ICED HONEY BUNS 4	\$7.00	(GOODE)		ceipt# 33
1	SAN MIGUEL RED SAUCE	\$1.60	1 SNACK CRACKER 12 — 1 BBB SAUCE	\$3.15 \$2.60	BEGINNII	NG BALANCES:	
1	SHORTS XL	\$23,40	1 HUNTS KETCHUP	\$2.85		Balance is N/A	
2	SNACK CRACKER 12 C/S	53.33	3 HOT SAUCE-LOUISIA	\$3.30 (\$32.50)		Limit Balance is N/A	
6	SNICKER 384C/S	\$9.00		the second of		DESCRIPTION	DDIOS
1	SPAM 24CS	51.90	Total	- Milital			PRICE
	THERMAL TOP 4X, 50000	\$13.00	Charge 15141010 +57155*			CHILI CHEESE FRITOS (10 CS)	\$5.30
	TOLLHOUSE COOKIE	\$2.90	Items marked with * are Loc	al Use Only	5	COMBO BEEF / CHEESE	\$7.00
06	TYPEWETTER RIBBONS		ENDING BALANCES:	3		CORRECTION TAPE 6 CS	\$1.80
	VANILLA WEERS		Available Balance is ***********************************	Acres .		DORITOS NACHO	\$4.80
	WHOLE MC " RL		Account Balance is	erio.	1	CHEESE 8CS	1077
	24CS/4368 PALLET					DRUMSTICK ORIGINAL	\$8.00
	WYLERS CHALLIN' BERRY	53.00				24CS DUPLEX COOKIES	\$8.00
	WYLERS LEGENDARY	53,00				ASSORTED 12CS	\$6.00





Home > Swintec Accessories, Options and Supplies > Typewriter Ribbons > Swintec > 7000

7000 1 product



For Models: 7000, 7000S, 7001, 7003, 7040



SWS 1009
Black Correctable Ribbon
For Models:
7000, 7000S, 7001, 7003, 7040



The Incarcerated Writers Project (IWP) aims to engage with writers in prisons across the United States. Since 2018, our main goal has been to encourage your continued growth as a writer by reading and providing written feedback on your work.

Submission Guidelines:

We accept work in the following categories:

- -Fiction (up to 5,000 words)
- -Nonfiction (up to 5,000 words)
- -Poetry (up to 5 pages)

*We cannot accept full manuscripts, but we can provide feedback on excerpts of larger pieces if the excerpt fits within our word/page count.

Nonfiction submissions that utilize information from sources outside the writer's personal experience, such as articles, statistics, reports, etc. must be submitted with a complete list of those sources in order to be considered for publication with *phoebe*. Citations should be formatted in Chicago style when possible.

Along with your work, send along a short cover letter that includes:

- Your name
- Inmate ID
- Current facility
- Any information you would like to share about your relationship to writing
- What kind of feedback you would like to receive from us
- *If you are set to be released within the next two years, please provide an alternate mailing address where you can receive mail.

Please submit all work in the same envelope on standard size 8.5 x 11 paper. We will return copies of your work with feedback from our readers. We may not be able to return original copies of your work, so we recommend not sending us your only copy.

Writers should send physical copies of their work to:

Incarcerated Writers Project

Phoebe Journal George Mason University The Hub Suite 1201, MSC5 4400 University Drive Fairfax, VA 22030

Visit us at https://phoebejournal.com/iwp/.

Email <u>incarceratedwritersproject@gmail.com</u> with any questions you may have, or send a letter to the address above.

Your Rights As An Author:

All work submitted to the Incarcerated Writers Project is considered for online publication with *phoebe*, provided the work follows the above guidelines and has not been previously published elsewhere.

If your work is published with *phoebe*, we ask for First North American Serial Rights to "the Work," which means the author grants us the following:

- 1. First American rights for print publication of the Work in a future issue of phoebe.
- Indefinite, non-exclusive rights for electronic publication of the Work at www.phoebejournal.com, as well as through phoebe's social media websites and newsletters.
- 3. Possible inclusion of the Work in a future anthology published by Phoebe Press.

All other rights are the author's, and they revert immediately upon the work's publication. The work may be republished along with an acknowledgement of its original publication in *phoebe*.

Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 76 of 213 PageID 79

Exhibit E

Electronic Messages

*Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 77 of 213 PageID 80

TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: 15141010 TO: Education

SUBJECT: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

DATE: 09/04/2023 10:56:47 AM

To: SOE L. Howard

Inmate Work Assignment: T-Orderly

Your unreasonably restrictive inmate photocopy schedule dated August 30, 2023, and your simultaneous posting of signage titled "Inmate Copier & Procedures" bearing the DOJ/BOP seal stating that the Trust Fund photocopier is restricted to "only legal documents" is not supported by actual BOP policy and no actual BOP policy is cited within these two self-publications.

However, these self-publications and your enforcement of these creations do run contrary to the long standing BOP Program Statements regarding inmate produced manuscripts and other authorized productive activities, i.e., educational correspondence course work, religious materials & course work, hobby craft art work and designs, etc. Your creation and enforcement of these unsupported policies are also incongruent to the stated objectives of the 2018 First Step Act as well as the stated objectives of BOP Director, Colette Peters.

If there is a penological reason for better control over the Trust Fund copier and its use, it is the facility's duty to find a reasonable solution that creates the least impediment against the legitimate use of the machine. If there are inmates abusing the use of the machine, those inmates should be held individually accountable without penalizing or depriving the whole and there is a BOP policy and procedure for that.

For these reasons, I strongly oppose these arbitrary restrictions and ask that you allow access to the photocopy machine during the the Education Center's business hours, Monday through Saturday, and that you rescind the restriction of "legal documents only" as it pertains to the copy machine.

No response received

TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: 15141010 TO: Trust Fund

SUBJECT: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

DATE: 09/04/2023 11:01:34 AM

To: Mr. Padgett

Inmate Work Assignment: T-Orderly

As you know, SOE L. Howard has created and posted restrictions governing the use of the Trust Fund photocopy machine. These restrictions were posted on 8/30 under a DOJ/BOP seal and titled "Policy & Procedures" limiting the copy machine to "legal documents only" and severely restricting the use of the machine to one hour per day Mon through Sat except for Tuesdays when no copies can be made.

This arbitrary "policy" is not supported by any BOP policy and none are cited in the signage. However, it does run contrary to BOP P.S. regarding manuscripts. Can we get the machine moved to recreation?

No response received

Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 79 of 213 PageID 82

TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: 15141010 TO: Recreation

SUBJECT: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

DATE: 10/06/2023 10:55:51 AM

To: Mr. Soto

Inmate Work Assignment: Clerk

I am enrolled in Hobby Craft pencil art and want a make a few photocopies and enlargements of pictures that I want to draw. Is it possible for me to come to recreation and make copies?

Mr. Soto refused to respond in writing but stated verbally that hunder cannot go to recreation to make copies

diam.

Philippie :

TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: Religious Services

TO: 15141010

SUBJECT: RE:***Inmate to Staff Message***

DATE: 10/06/2023 12:27:02 PM

No Sir. Correspondence courses are an education department function.

From: ~^! MORRIS, ~^!RANDALL ALLEN <15141010@inmatemessage.com>

Sent: Friday, October 6, 2023 4:26 PM

Subject: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

To: Mr. Shanfish

Inmate Work Assignment: Clerk

Regarding religious correspondence courses, is it possible to come to Religious Services to make a copy of course work and test sheets before putting the originals out in the mail?

NOTICE OF ABUSES

The attached essay describes deprivations, abuses and humiliations by the FCI-Seagoville Supervisor of Education, L. Howard.

Your assitance in publishing or sharing this essay would be greatly appreciated and it might put a stop to these abuses.

The Federal Bureau of Prisons Program Statement 5350.27 regarding the production of "Inmate Manuscripts" states that its purpose is "To encourage inmates to use their leisure time for creative writing and to permit the direct mailing of all manuscripts as ordinary correspondence."

It further defines manuscripts under §551.80 as "fiction, nonfiction, poetry, music and lyrics, drawings and cartoons, and other writings similar in nature."

Under §551.81, it goes on to specify that "an inmate may prepare a manuscript for private use or for publication while in custody without staff approval."

The Black's Law Dictionary defines manuscript as "An unpublished writing; an author's typescript or written work product that is proposed for publication."

Due to the wording and encouragement of the BOP program statement, it is reasonable to conclude that authorization for an inmate to duplicate or photocopy a manuscript at the inmate's expense is strongly inferred and highly implied.

You have my permission to edit and to publish this notice and the attached essay in whole or in part. You also have my permission to use my full name and location with any publication.

Randall Morris FCI-Seagoville, Texas Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 82 of 213 PageID 85

TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: 15141010 TO: Education

SUBJECT: ***Request to Staff*** MORRIS. RANDALL, Reg# 15141010, SEA-F-A

DATE: 09/13/2024 01:26:17 PM

To: MS. Howard

Inmate Work Assignment: Ord

Ms. Howard: As you know, we have produced the veterans newsletter (Seagoville Bars & Stripes) since June 2023. To date, we have produced 15 editions with the last two having been published on Trulincs to the general population due to the historic content of the recently discovered German newsletters that had been produced at Seagoville from 1943 to 1944. I am in the midst of translating these historic documents and began to publish them at a rate of one per month in June along with our contemporary newsletter. Furthermore, Dr. Poulson, Chaplin Schanfish and Dr. Hernandez have participated in some of our published articles, which always have staff approval before publication, and Dr. Poulson & Chaplain Schanfish have asked to be copied on each installment of the German newsletter translation.

With the story research, drafts, hand drawn art that must be manually imbedded in those drafts and the the german translation work, I spend a very significant time on this each week up until lights out most nights. Moreover, having Robert Williams (who does the hand drawn art) just a few doors down in my unit has allowed me to bring this newsletter up to the size and quality that it is today and I have been informed by Robert that he had recently given you a copy of our June & July editions.

The warden was recently in our courtyard and remarked that she had read our newsletters and is amazed that we do this on a typewriter and that she will be looking into getting us a word processor for this purpose (her words). If this is her sentiment, it is not a stretch to assume that having the typewriter in our building is a no-brainer.

I am informed that as of yesterday, Mr. Sandles did not want the typewriter in his office any longer and had returned it to you and that you have made a place for it in the Career Center and that it is under lock & key until it is checked out.

As I explained above, the work that I put into this newsletter is significant and the conditions under which we had put it together (with hand drawn art, etc.) on a typewriter were already taxing to the point that your current solution effectively shuts down the newsletter. (BTW, Robert and I do not get paid for the work that we invest in the newsletter)

Before it becomes necessary for me to have to give reasons as to why the nessletter has stopped or to seek resolution elsewhere, I would like to ask you to consider allowing the typwriter to be stored in the secure supply office in building #10 that our head orderly, Del Warner, strictly runs for Ms. Evans. I propose that we could check out the typewriter using our ID cards with Warner just as we do with our iron & ironing board. As you know, Del is also very efficient at maintaining and repairing the typewriters.

TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: Education TO: 15141010

SUBJECT: RE:***Inmate to Staff Message***

DATE: 10/08/2024 01:07:02 PM

Per policy, typewriters are for legal use only and maintained in the Law Library.

From: ~^! MORRIS, ~^!RANDALL ALLEN <15141010@inmatemessage.com>

Sent: Thursday, October 3, 2024 11:46 AM

Subject: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

To: SOE Howard

Inmate Work Assignment: Ord

Further to my 9/13 email regarding the need for the typewriter to be reinstated in building #10 for the Bars & Stripes newsletter (which had been in place for over a year until recently) and your verbal response that you would be consulting the current AW and would get back with me, I would like to inquire about the outcome as our newsletter is currently shutdown due to this new restricted access to the typewriter as was described in my 9/13 email to you.

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TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: 15141010

TO: Unit F

SUBJECT: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

DATE: 10/09/2024 12:16:43 PM

To: Unit Team

Inmate Work Assignment: Ord

Please see the message from SOE Howard below. Although you have already verbally told us many times that inmate legal and non-legal photocopies are to be done on the Inmate Trust Fund Copier in the Education building, SOE Howard continues to assert that the Inmate Trust Fund Copier is for the duplication of "legal documents only".

-----Education on 10/9/2024 10:37 AM wrote:

Copy cards and the inmate copier are for legal use only. Please contact your unit team for further assistance.

From: ~^! MORRIS, ~^!RANDALL ALLEN <15141010@inmatemessage.com>

Sent: Tuesday, October 8, 2024 7:26 PM

Subject: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

To: SOE Howard

Inmate Work Assignment: Ord

Ms. Howard: I finished a manuscript of literary works and will be sending it to the Library of Congress' Copyright Office to copyright the work.

The Copyright Office application instructions state that I should not send my original work and must submit 2 (two) copies of the work to be copyrighted.

I want to use the inmate trust fund copy machine to make the two copies. How should I proceed?

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TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: 15141010 TO: Education

SUBJECT: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

DATE: 10/09/2024 03:55:29 PM

To: SOE Howard

Inmate Work Assignment: Ord

Your response seems to be directing me to unit team to make "legal copies" of my non-legal manuscript that I wish to submit to the US Copyright Office for copyright. If this is the case, what it is the Inmate Trust Fund Copy Machine for and under what BOP policy are you suppressing inmate non-legal copies.

As I stated to you before, unit team is pointing to the Inmate Trust Fund Copier for the copies the non-legal copies that I and many others are requesting.

----Education on 10/9/2024 2:27 PM wrote:

Please refer to your previously submitted Administrative Remedy Response, September 2023 which states:

P.S. 1315.07: "The institution staff shall, upon an inmate's request and at times scheduled by staff, duplicate legal documents if the inmate demonstrates that more than one copy must be submitted to court and that the duplication cannot be accomplished by use of carbon paper. The inmate shall bear the cost, and the duplication shall be done so as not to interfere with regular institution operations. Staff may waive the cost if the inmate is without funds or if the material to be duplicated is minimal, and the inmate's requests for duplication are not large or excessive."

From: ~^! MORRIS, ~^!RANDALL ALLEN <15141010@inmatemessage.com>

Sent: Wednesday, October 9, 2024 11:29 AM

Subject: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

To: SOE Howard

Inmate Work Assignment: Ord

SOE Howard: Further to your email response today rejecting my request to make U.S. Copyright Office application process photocopies on the Inmate Trust Fund Copier at my expense, and as unit team does not allow these copies to be made on their admin copy machine (because they point to the Inmate Trust Fund Copy Machine for this purpose), I would like to ask what BOP policy you are invoking to suppress inmate use of the Trust Fund Copier for non-legal photocopies?

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TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: Education TO: 15141010

SUBJECT: RE:***Inmate to Staff Message***

DATE: 10/15/2024 09:32:02 AM

"College Guild correspondence course work and my Prison Journalism Project journalism correspondence course work" are not approved Correspondence Courses per PS. P5354.03 DATE: 12/17/2003 SUBJECT: Postsecondary Education Programs for Inmates.

Please refer to your previously submitted Administrative Remedy Response, September 2023 which states:

P.S. 1315.07: "The institution staff shall, upon an inmate's request and at times scheduled by staff, duplicate legal documents if the inmate demonstrates that more than one copy must be submitted to court and that the duplication cannot be accomplished by use of carbon paper. The inmate shall bear the cost, and the duplication shall be done so as not to interfere with regular institution operations. Staff may waive the cost if the inmate is without funds or if the material to be duplicated is minimal, and the inmate's requests for duplication are not large or excessive."

From: ~^! MORRIS, ~^!RANDALL ALLEN <15141010@inmatemessage.com>

Sent: Saturday, October 12, 2024 11:06 AM

Subject: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

To: SOE L. Howard

Inmate Work Assignment: Ord

This is an ADA request for a reasonable accommodation of my disability.

SOE L. Howard: Since 9/30/2023, you have repeatedly stated both in written responses to Trulincs messages and verbally to myself and other inmates that the typewriters and Trust Fund Inmate Photocopy Machine are for "legal documents only" per BOP "policy" and that all authorized non-legal documents (text and art) can be created manually (by hand) and duplicated manually (by hand) which is, by default, the only option left sans the typewriter and copy machine.

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I am right-handed and have been suffering from a progressive Dupuytrens Contracture in my right hand which makes is painful and prevents me from creating and duplicating my often voluminous College Guild correspondence course work and my Prison Journalism Project journalism correspondence course work because it is painful to grip a pen or pencil for the length of time that would be required to hand create and duplicate my authorized documents.

The quality of my handwriting is also tremendously degraded due to this difficulty which greatly effects the legibility of my writing of such volume. However, I do not experience any pain or difficulty pecking on a computer keyboard or typewriter as this does not require me to grip and hold as handwriting does.

Beyond the creation of documents, I need to duplicate my correspondence course work before I send the originals in the mail due to the obvious risk of the loss of mail especially given my ongoing and documented mail problems with our prison mailroom.

My BOP health record now reflects the Dupuytrens Contracture in my right (writing) hand. For the full entitlement that the First Amendment of expression provides and with proper notice of my disability now provided. I am requesting a reasonable accommodation of my disability by the allowance of my use of a typewriter and the Trust Fund Photocopy Machine to create and duplicate all authorized non-legal and legal documents at my own expense.

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TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: 15141010 TO: Education

SUBJECT: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

DATE: 10/15/2024 10:53:12 AM

To: SOE L. Howard

Inmate Work Assignment: Ord

SOE L. Howard: Further to the request regarding how to gain approval for educational and rehabilitative correspondence courses, I want to qualify that I have been taking a creative writing course from the College Guild for 16 months and a journalism course from the Prison Journalism Project for 4 months. One only needs to Google these organizations to see that they are both respected and legitimate.

You were already asked lest year to recognize the College Guild courses but you declined stating, "We already offer comparable courses." However, the fact is that you not only do not offer comparable courses, you hardly offer any courses at all and your education building has suffered from incessant and chronic closures since January 2024. These chronic closures continue despite that you have had a full staff for months. I have meticulously documented each and every closure which includes your own signs and Trulincs messages announcing these closures. It is so bad, that we have only had access to the copy machine one time for 20 minutes since Friday, 10/11. This is also negatively impacting those who need access to the law library and typewriters.

Further to the barren wasteland of education offerings, I was actually recently given a negative Unit Team review that states that I did not participate in any of your unprovided classes from January 2024 to July 2024!!! I cannot take what you do not offer.

You do offer one blue-collar, vocational Dallas College course (car mechanic) that I have no interest in and a sprinkling of superficial inmate taught, unaccredited, non-transferrable ACE classes that do not require text books and for which the easy answers to the superficial exit tests are provided by the instructors. Because this is all that you sometimes intermittently offer, I take your classes whenever they are offered but only when I can beat the stampede of inmates for the sign up for these classes. Beating that stampede is a challenge as it is documented in my BOP health file that I am a disabled veteran and ambulating T-6 paraplegic.

Moreover, the impotent Pell Grant for Inmates does not allow for us to import accredited academic college correspondence courses and have the Pell pay for it due to the Dept. of Education's PEP illogical and cumbersome registration PEP process that is required of each school.

So, I have taken it upon myself to enroll in correspondence courses that far exceed anything that you are offering and now need the use of a typewriter and copy machine due to a progressive disability in my writing hand.

How do I get my courses approved so that I can earn my certificates?

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TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: Religious Services

TO: 15141010

SUBJECT: RE:***Inmate to Staff Message***

DATE: 10/21/2024 12:57:02 PM

No. The chapel typewriter and copier will not be available for use.

From: ~^! MORRIS, ~^!RANDALL ALLEN <15141010@inmatemessage.com>

Sent: Monday, October 21, 2024 5:05 PM

Subject: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

To: Chpl. Schanfish

Inmate Work Assignment: Ord

Thank you for the response.

For clarity, are we allowed to use the Religious Services typewriter to create course work?

And/or, are we allowed to use the Religious Services photocopy machine to duplicate that course work before sending the originals in the mail to the schools?

----Religious Services on 10/21/2024 10:12 AM wrote:

>

We have a large variety of correspondence courses to choose from. Just stop by the chapel to get the list.

From: ~ ! MORRIS, ~ ! RANDALL ALLEN < 15141010@inmatemessage.com >

Sent: Saturday, October 19, 2024 7:46 PM

Subject: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

To: SOE L. Howard

Inmate Work Assignment: Ord

SOE L. Howard: I want to enroll in a religious correspondence course. Do I need your approval to do this? If so, what is the process and criteria that is used?

The course was advertised in Prison Legal News - May 2024 - Vol. 35, No. 5.

The school is: International Christian College & Seminary P.O. Box 530212

Debary, FL 32753

iccscampus.org

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TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: 15141010 TO: AW Programs

SUBJECT: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

DATE: 10/22/2024 02:27:41 PM

To: AW Rhodes

Inmate Work Assignment: Ord

AW Rhodes: Subsequent to today's interview with SIS Lt. Hill and yourself regarding my recent emails to SOE Howard requesting use of the typewriters and Inmate Trust Fund Copier as a reasonable accommodation to my inability to grip a pen/pencil to create and duplicate non-legal but otherwise authorized documents, I am, herewith, forwarding to you the message that I just sent to medical requesting assistance with verification of my medical condition as you had requested.

For clarification, I was interviewed at 12:20 pm today by SIS and you about the above request to SOE Howard as well as separate emails from me to SOE Howard requesting approval of two specific correspondence school courses with contact info to both schools, an email request to clarify whether I need to gain approval for a specific religious correspondence course which also requested whether I can use the typewriters & copy machine for that religious course work, and another email asking SOE Howard if the typewriters and Trust Fund Copier can be used for BP-8, 9, 10 & 11s and any civil filings related to BP-8, 9, 10 & 11s.

I was told that the purpose of the summons and my appearance with SIS and you was that my email requests to SOE Howard had been regarded as "harassment" and I was told by you to obtain medical evidence of my disability for you to consider in determining whether to grant the accommodation of my claimed disability.

However, I did not receive a response from SOE Howard or you as to the request for the approval of the two correspondence courses, the request regarding course approval and use of machines for a specific religious correspondence course or whether BP-8, 9, 10, 11s, and civil filings can be created and duplicated on the typewriters & Trust Fund Copier. I would still like to have these questions as they had not been posed to SOE Howard before and, therefore, have never been answered by her.
-----MORRIS, RANDALL ALLEN on 10/22/2024 2:03 PM wrote:

In order to get approval for the use of a law library typewriter and the Inmate Trust Fund Copier to create and duplicate non-legal documents, I have been instructed by AW Rhodes that I must show that I have a condition that inhibits me from properly gripping a pencil/pen to create and duplicate non-legal docs manually by hand.

What do I need to do in order to provide AW Rhodes this documentation?

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TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: 15141010 TO: Health Services

SUBJECT: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

DATE: 10/24/2024 05:02:55 PM

To: Medical

Inmate Work Assignment: Ord

I have not received an answer from you for the inquiry below that I had sent on 10/22.

Again, AW Rhodes has requested that I provide some edical evidence that I have a disability in my right hand. This information is needed for his consideration of my request for a reasonable accommodation for this disability. Specifically, I am asking for use of a typewriter and the Inmate Trust Fund Copy Machine at my own expense in order to create and duplicate non-legal, but otherwise authorized literary works. Without confirmation of this disability, I am being required to create and duplicate documents by hand.

----MORRIS, RANDALL ALLEN on 10/22/2024 2:03 PM wrote:

In order to get approval for the use of a law library typewriter and the Inmate Trust Fund Copier to create and duplicate non-legal documents, I have been instructed by AW Rhodes that I must show that I have a condition that inhibits me from properly gripping a pencil/pen to create and duplicate non-legal docs manually by hand.

What do I need to do in order to provide AW Rhodes this documentation?

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TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: 15141010 TO: AW Programs

SUBJECT: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

DATE: 10/24/2024 05:06:53 PM

To: AW Rhodes

Inmate Work Assignment: Ord

AW Rhodes: As I did not receive a response from medical to my 10/22 electronic request for the medical info that you had requested from me, I just re-sent the message below to medical with additional clarification as to the reason for request.

-----MORRIS, RANDALL ALLEN on 10/24/2024 5:02 PM wrote:

I have not received an answer from you for the inquiry below that I had sent on 10/22.

Again, AW Rhodes has requested that I provide some edical evidence that I have a disability in my right hand. This information is needed for his consideration of my request for a reasonable accommodation for this disability. Specifically, I am asking for use of a typewriter and the Inmate Trust Fund Copy Machine at my own expense in order to create and duplicate non-legal, but otherwise authorized literary works. Without confirmation of this disability, I am being required to create and duplicate documents by hand.

-----MORRIS, RANDALL ALLEN on 10/22/2024 2:03 PM wrote:

In order to get approval for the use of a law library typewriter and the Inmate Trust Fund Copier to create and duplicate non-legal documents, I have been instructed by AW Rhodes that I must show that I have a condition that inhibits me from properly gripping a pencil/pen to create and duplicate non-legal docs manually by hand.

What do I need to do in order to provide AW Rhodes this documentation?

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BP-S148.055 INMATE REQUEST TO STAFF CDFRM SEP 98

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF PRISONS

TO: (Name and Title of Staff Member)	DATE:		
Ms. Ritchie	10/29/2024		
FROM: Randall Morris	REGISTER NO.: 15141010		
WORK ASSIGNMENT: Ord	UNIT: F-10		
Continue on back, if necessary. Your fai	concern and the solution you are requesting. lure to be specific may result in no action being ewed in order to successfully respond to your		
I need a copy of my medical file that pert	tains only to the last 30 days.		
Specifically, I need all references to app	pointments, examinations, X-Rays, and treatment		
for the Dupuytrens Contracture in my hand	within the last 30 days.		
This is needed for AW Rhodes to consider a	a reasonable accommodation of my condition.		
Supporting emails are attached.			
Attached: New Trubines arcsinges effort.	to AW Rhodes copying him on this		
460 000 000	te below this line)		

DISPOSITION:

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TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

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FROM: 15141010 TO: Health Services

SUBJECT: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

DATE: 10/29/2024 07:42:43 AM

To: Ms. Ritchie

Inmate Work Assignment: Ord

I need a copy of my medical file that pertains only to the last 30 days.

Specifically, I need all reference to appointments, examinations, X-Rays, and treatment for the Dupuytrens Contracture in my hand. This is needed for AW Rhodes to consider a reasonable accommodation to my condition.

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TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

......

FROM: 15141010 TO: AW Programs

SUBJECT: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

DATE: 10/29/2024 07:51:28 AM

To: AW Rhodes

Inmate Work Assignment: Ord

AW Rhodes: Further to your stated requirement that I must provide you with medical evidence of a progressive condition in my hand which now prevents me from gripping a pen/pencil so that you may consider my request for a reasonable accommodation of this disability, I have not received responses to the two messages that I had sent to Health Services (of which I had courtesy copied you) requesting this medical evidence.

Below is a copy of my email this morning to Ms. Ritchie, who, I have been told by inmates, is in charge of medical records. I will print that email this morning and deliver the physical copy of it to Ms. Ritchie's office today.

----MORRIS, RANDALL ALLEN on 10/29/2024 7:42 AM wrote: to Ms. Rifdie

I need a copy of my medical file that pertains only to the last 30 days.

Specifically, I need all reference to appointments, examinations, X-Rays, and treatment for the Dupuytrens Contracture in my hand. This is needed for AW Rhodes to consider a reasonable accommodation to my condition.

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TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: 15141010 TO: AW Programs

SUBJECT: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

DATE: 11/04/2024 11:34:21 AM

To: Mr. Schufelt

Inmate Work Assignment: Ord

We spoke @ Mainline today and you advised that AW Rhodes is no longer here and that I should hold on to my BOP medical file until another AW arrives to fill the position.

As I have an immediate need for the accommodation of my disability (described in the forwarded messages below) and there was no indication as to how long it will be before an AW arrives, I want to ask if my request can be considered by any interim/temporary AW that might be appointed until the replacement AW arrives.

----MORRIS, RANDALL ALLEN on 11/4/2024 10:06 AM wrote:

Mr. Schufelt: I had sent AW Rhodes the forwarded message below on Friday, 11/1, and attempted to see him this morning (Monday, 11/4) with my BOP medical record that specifies my medical condition, but I was informed that 11/1 was the AW's last day at Seagoville. Is there an acting AW that can look at and complete this request?

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---MORRIS, RANDALL ALLEN on 11/1/2024 12:13 PM wrote:

AW Rhodes: Regarding your instructions to me on 10/22 that I should provide you with my BOP medical record showing my inability to create and reproduce documents by hand so that you may consider my request to accommodate this disability by allowing me to use the typewriters and Inmate Trust Fund copy machine for the creation and duplication of both legal and non-legal documents, I have obtained my BOP medical record and respectfully ask how to proceed.

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Exhibit F

Administrative Remedies

SOF L. Howard's response to organal complaint

BP-8 Morris, R., 15141-010

- /. SOE L. Howard asserts that the inmate use of the Trust Fund photocopier as authorized in BOP Program Statement 4500.12...
- Response: P.S. 4500.12 was not cited in any legal copier communication regarding it's relocation and hours of operation.
- P.S. 4500.12 states, "Copier service is provided by an outside contractor that allows an inmate to purchase copy services. The contractor may provide a special copy card for sale in the Commissary. The card's cost is negotiated with the contractor and marked up as a regular inventory item in TRUFACS."
- The trust fund program statement does not address the location, hours or types of duplication that can be made by incarcerated individuals.
- 5. P.S. 1315.07 clearly states, "The institution staff shall, upon an inmate's request and at times scheduled by staff, duplicate legal documents if the inmate demonstrates that more than one copy must be submitted to court and that the duplication cannot be accomplished by use of carbon paper. The inmate shall bear the cost, and the duplication shall be done so as not to interfere with regular institution operations. Staff may waive the cost if the inmate is without funds or if the material to be duplicated is minimal, and the inmate's requests for duplication are not large or excessive."

Hobby Craft items, when enrolled in the program, are able to make copies in Recreation by the staff discretion based on the project(s) they are working on and the medium that is being taught in the specific enrolled class.

F. Religious work that requires copies can be brought to Religious Trulines Services staff who will make copies at their discretion.

P.S. 5350.27 Inmate Manuscripts "encourages inmates to use their leisure time for creative writing and to permit the direct mailing of all manuscripts as ordinary correspondence." It does not clearly specify that copies can and should be made.

All FSA/ACE courses taught under the Education Department: If handouts are necessary and applicable to the course, they are distributed to the attendees.

See attached Black's Law Dictionary's dofinition of "manuscript" which makes it clear that they can be typed and or written. Duplication is reasonably interred in the context of authorized and encouraged productive getruities.

- Those individuals enrolled in correspondence courses, and require copies for the coursework are made available by 'Education staff.
- #. The copy hours have been posted to Trulincs which clearly state, "Please see an Education Department staff if you are requesting immediate assistance." It further states, "a request for an alternate day or time can be made."

They wre "Law currently enrolled in the Blackstone Career Institute's spealed certification program and the College Guild's creative withing & Journalisan Correspondence course. I often false tests (open book mon-prootored) and create course work that I send in the mail to both schools. Is it "required" that I make a photocopy of my fests and original course work before I send it out in the mail? No. I have nothing to show thousand that this is "required" and she clements proof of "requirement".

Does it dely common sense to send the originals out in the mail without a back up copy? Yes. Howards restrictions are unreasonable and abustive.

INMATE'S COMPLAINT:

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SEA 1330.18(c)
Administrative Remedy Program
June 1, 2017
Attachment 1

Federal Correctional Institution Seagoville, Texas

Administrative Remedy Procedures for Inmates Informal Resolution Form

Bureau of Prisons Program Statement 1330.18, Administrative Remedy Program, requires, in most cases, that inmates attempt informal resolution of grievances prior to filing a formal written complaint. This form will be used to document your efforts toward informally resolving your grievance. Complete items 1-3 and return to your Correctional Counselog

TO: Ms. Evans - Please escalate to Warden Rivers

1. State your specific complai	nt:	
	arrative plus supporting docume	nts
2 State what offer to		Dec.
	made to informally resolve your compla	aint:
Please see attached		*
. State what resolution you re		
Please see attached name	rative	
Randall Morris	# 151 4 1010	F-10
mate Name	Register Number	Unit
	9/6/2023	
mate Signature	Date	
ORRECTIONAL COUNSE	LOR:	
Efforts made to informally re	solve and staff contacted: Dlas	is bee attached
		the fact (resource)
7		
).	9/12/12	
No Informal Resolution - Issu	ued BP-9 on 112 (Date)	
ormally Resolved on	~ t	
/	Inmate S	Signature
unsclor's Signature:	Date:	13/23
, , , , , , , , , , , , , , , , , , ,	X V	1 2 0 2
it Manager Review:	11 I A	1 / / 1 / / /
	Date:	112/2

EXPANDED NARRATIVE (To be attached to a BP 8.5)

1. State your specific complaint:

Through the recent posting of signage bearing the seal of the DOJ/BOP and a header titled "Inmate Copier Policies and Procedures", SOE L. Howard asserts that the inmate use of the Trust Fund photocopier as authorized in BOP Program Statement 4500.12, Chapter 5, §§5.1 and 5.2, is restricted to only the photocopying of "legal documents" and that the activity can be further restricted to 1 (one) hour per day, Monday through Saturday except for Tuesdays during which no photocopying is scheduled. (See attached Exhibits 1 & 2)

These extreme restrictions are not supported by any current BOP policies or Program Statements and although SOE Howard's new "policy" signage (Exhibit 1) cites Program Statement 1315.07 in its attempt at legitimacy, her cited P.S. does not expressly limit what the Trust Fund photocopier can be used for. It should also be noted that SOE Howard's new policy signage contains no other citations that point to actual BOP policy, program statements or authority.

However, BOP Program Statement 5350.27 regarding Inmate Manuscripts along with the BOP manuscript definition (§551.80) and manuscript preparation (§551.81), clearly encourage non-legal productive activities that can and often do require the use of the photocopy machine and typewriters. (See Exhibit 3 - BOP Manuscript P.S.) FSA class/course work, approved Hobby Craft activities, educational correspondence courses (especially considering the lack of education offerings @ FCI-Seagoville), manuscripts, religious work product and all other BOP encouraged activities requiring the use of the photocopy machine are nullified by this abuse of discretion. And considering that our education center, law library and reading library are often closed during the week due to staff shortages, it now appears to be a misuse of staff to to dedicate a staff member to watch the copy machine in order to prevent inmates from copying that which is encouraged by BOP policy.

State All Efforts Made to Informally Resolve:

Please see Trulincs message to SOE L. Howard dated 9/4/2023 (attached Exhibit 4) requesting that she rescind her arbitrary restrictions regarding the Trust Fund Photocopy machine citing the reasons above.

Please see message to Trust Fund Supervisor, Padgett, dated 9/4/2023 (attached Exhibit 5) explaining the newly implemented copy machine restrictions by SOE Howard and requesting either a second photocopy machine or to relocate the existing copy machine out of the education building and away from the abusiveness of SOE Howard.

3. State Desired Resolution:

For Warden Rivers to issue a directive that sufficiently removes the current impediments to the Trust Fund photocopy machine and/or relocates the photocopy machine to a location that can sufficiently serve the needs of the inmate population without further impediment and to the full extent of use that it is authorized.

Randall Morris 9/6/2023

Document 3

Filed Q2/LS124OR REGENOSTON RESERVE PRESENDS 104

BP-229(13) APRII 1982

Federal Bureau of Prisons

	Type or use ball-point pen. If attachments a	15141010	F-10	FCI-Seagoville
rom: _	Morris, Randall A. LAST NAME, FIRST, MIDDLE INITIAL	REG. NO.	UNIT	INSTITUTION
uct has use has	-INMATE REQUEST In complete distion of inmate manuscripts and other implemented a defacto ban of the in the photocoping or productions further restricted the use of the ly one hour on those days creating	eregard of BOP Progr ner authorized produ Trust Fund photoco n of anything that s ne photocopy machine	am Statements ctive activiti py machine and he deems to be	regarding the prod es, SOE L. Howard typewriters for not legal. Howard
ine the ed	Howard stated to me that if she e for anything other than "legal wenther they would start writing the ran inmate what he was typing and sponded, "not on my watch! Legal w	work" she would have newspapers". (Improp when he responded t	to allow ever er motive) She	yone to do so and also recently ask
reh Col	ese arbitrary bans and restriction habilitative goals and they are no lette Peters. Furthermore, I inter aint directly to the BOP director	ot in line with the nd to test those sta	stated goals o ted goals by s	f BOP Director
Ms.	. Howard fails to understand that	restricting the use	of the machin	es will not stop
		7		
art B-	DATE 9/18/2023 - RESPONSE inmates from writing to (The full complaint, o	the newspapers but i exhaustion & exhibit	signature of t will, in fac s are attached	t, encourage it. /
Part B	- RESPONSE inmates from writing t	the newspapers but i	t will, in fac	t, encourage it. /
dissatisfi	- RESPONSE inmates from writing t	exhaustion & exhibit	t will, in facts are attached	nal director

Remedy No.: #1182687-F1

This is in response to your Request for Administrative Remedy received in this office on November 29, 2023, wherein you requested "For Warden Rivers to issue a directive that sufficiently removes the current impediments to the Trust Fund photocopy machine and/or relocates the photocopy machine to a location that can sufficiently serve the needs of the inmate population without further impediment and to the full extent of use that it is authorized."

A review of this matter reveals that you are attempting to utilize the legal copier to make duplicates of manuscripts, FSA class/course work, approved Hobby Craft activities, educational correspondence courses, religious work and all other BOP encouraged activities which are not defined as legal material. Per Program Statement 1315.07, Legal Activities, Inmate, clearly states: [g. The institution staff shall, upon an inmate's request and at times scheduled by staff, duplicate legal documents if the inmate demonstrates that more than one copy must be submitted to court and that the duplication cannot be accomplished by use of carbon paper. The inmate shall bear the cost, and the duplication shall be done so as not to interfere with regular institution operations. Staff may waive the cost if the inmate is without funds or if the material to be duplicated is minimal, and the inmate's requests for duplication are not large or excessive.]

Per Program Statement 1221.66, <u>Directives Management Manual Rules</u>, Chapter 3, 3.1 Overview states: The Bureau includes its published Rules in the applicable PSs so staff may rely on just one source for policy guidance. Rules (commonly referred to as "rules text") are printed in bold type and enclosed in brackets [like this] to differentiate them from what is commonly referred to in a PS as "implementing text" or "non-rule" text.

Program Statement 1315.07, <u>Legal Activities</u>, Inmate, as cited above, appears bold and in brackets, thus the verbiage extracted is considered "rules text" or rules as defined by the Directives Management Manual.

Per Program Statement 4500.12, <u>Trust Fund/Deposit Fund Manual</u>, Chapter 5, page 52, section 5.2, Inmate Copier Service states: Copier service is provided by an outside contractor that allows an inmate to purchase copy services. The contractor may provide a special copy card for sale in the Commissary. The card's cost is negotiated with the contractor and marked up as a regular inventory item in TRUFACS.

Referencing the above noted policies, copy cards are available for purchase through the Commissary to be utilized for legal copy purchases. The legal copy machine may be utilized to duplicate legal documents that are requested in duplicate from the courts. Furthermore, a request for alternate day or time or additional assistance can be requested if assistance is needed outside of posted hours. Based on the aforementioned, you are permitted to utilize the legal copy machine to duplicate legal documents deemed necessary and in requested in duplicate by the courts.

Therefore, based on the above information, this response to your Request for Administrative Remedy is denied. If you are not satisfied with this response, you may appeal to the Regional Director at Bureau of Prisons, South Central Region, 344 Marine Forces Drive, Grand Prairie, Texas 75051, via a BP-10. Your appeal must be received in the South Central Regional Office within 20 days of the date of this response.

C Rivers Warden

Date

Type or use ball-point pen. If attachments are needed, submit four copies. One copy of the completed BP-DIR-9 including any attachments must be submit this appeal.				
From: _ Randall Morris	15141010	F-10	FCI-Seagoville	
LAST NAME, FIRST, MIDDLE INITIAL	REG. NO.	UNIT	INSTITUTION	
Part A—REASON FOR APPEAL				
See the attached expanded narrative		uoll as Const	itutional claims	
This appeal contains unresolved com of Impeded Access to the Courts, Im Associate and violation of Equal Proceed The foundation of the complaint and P.S. 5350.27, Inmate Manuscripts as	plaints of abuses as peded Freedom to Commototection. appeal is the ongoin it pertains to the a	unicate, Imped	disregard of	
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Part B-RESPONSE

12/9/2023

DATE



SIGNATURE OF REQUESTER

RECEIVED

JAN 1 9 2024

EUREAU OF PRISONS LEGAL DEPARTMENT, SCRO

LEGAL DEPAR MENT, SOF	0		
1_EGAL D			
DATE		REGIONAL DIRECT	TOR
If dissatisfied with this response, you may appeal to the General Counsel. days of the date of this response.	Your appeal must be receive		fice within 30 calendar 182687-R 3
ORIGINAL: RETURN TO INMATE		CASE NUMBER:	18265 / 11
Part C—RECEIPT		CASE NUMBER:	
Return to:LAST NAME, FIRST, MIDDLE INITIAL	REG. NO.	UNIT	INSTITUTION
SUBJECT:		control and the second of the	BP-230(13)

RECEIVED

PART A: BP-10 APPEAL (Remedy #1182687-F1)

1. In Paragraph #2 of the Warden's Response and Denial of the Request for Administrative Remedy (BP-9), the Trust Fund Inmate Photocopy Machine is referred to by the Warden as "the legal copier". However, the term "legal copier" is found nowhere in the P.S. 4500.12 Trust Fund/Deposit Fund Manual or any other guiding or governing BOP publication. And the improper use of the term "legal copier" insinuates, prejudices, and grooms the casual reader into blindly accepting that the inmate copy machine is only for legal document duplications.

In fact, P.S. 4500.12 Trust Fund/ Deposit Fund Manual specifically refers to the copy machine as "Inmate Copier Service", "Copier Service", and "Copier".

- P.S. 1315.07 Inmate Legal Activities refers to the copy machine as "Institution copying equipment" and "copy vending machines" which is blatantly neutral and non-possessive.
- 2. Paragraph #2 of the Warden's Response further cites paragraph "g." of P.S. 1315.07

 Inmate Legal Activities to support his assertion that P.S. 1315.07 limits the use of the inmate copy machine to the duplication of only legal documents. However, careful review of P.S. 1315.07 with particular scrutiny of paragraph g. reveals no specific or insinuated language that limits the copy machine use to only legal document duplication. The language in P.S. 1315.07 does discuss legal activites and legal document duplication as one would expect from a P.S. that was designed with the specific purpose of discussing legal activites. Likewise, P.S. 5350.27 Inmate Manuscripts only dicusses the creation/duplication/mailing of inmate manuscripts and not legal documents.
- 3. Paragraph #3 of the Warden's Response states, "Per Program Statement 1221.66, <u>Directives Management Manual Rules</u>, Chapter 3, 3.1 Overview states: The Bureau includes its published Rules in the applicable PSs so staff may rely on just one source for guidance. Rules (commonly referred to as "rules text") are printed in bold type and enclosed in brackets [like this] to differentiate them from what is commonly referred to in a PS as "implementing text" or "non-rule" text."

Paragraph #4 of the Warden's Response further states that, "Program Statement 1315.07, Inmate Legal Activities, as cited above [referring to paragraph #2 of the Warden's Response], appears bold and in brackets, thus the verbiage extracted is considered "rules text" or rules as defined by the Directives Management Manual."

One of the primary purposes of the Bureau's program statements is to provide implementation instructions for codified programs under the provisions of Title 28 of the Code of Federal Regulations that were written for the Federal Bureau of Prisons. As such, the relevant provisions of 28 CFR are included within each program statement so that FBOP staff can rely on the program statements as the single source for guidance, as is established in P.S. 1221.66 <u>Directives Management Manual</u>, Chapter 3, §3.1, rather than requiring staff to look up the relevant CFR provisions for guidance.

It appears that the Warden is erroneously asserting that the "one source" provision in the Directives Management Manual permits FBOP staff to rely on a single paragraph found in a single program statement while ignoring all other applicable provisions in other program statements to create arbitrary and capricious restrictions and limitations of inmates' use of authorized services, programs and activities.

- 4. Paragraph #5 of the Warden's Response includes nothing that furthers the Warden's argument that the copy machine is for legal documents only and it provides no further justification for the Denial of the Administrative Remedy.
- 5. Paragraph #6 of the Warden's Response simply attempts to draw an unfounded conclusion that the Trust Fund Inmate Photocopy Machine is to be exclusively used for the duplication of only legal documents and it, again, erroneously references the copy machine as "The legal copy machine".
- 6. Paragraphs #6 & #7 of SOE Howard's Response to the original Informal Complaint (attached) demonstrates that despite SOE Howard's arbitrary restrictions on the Trust Fund Copy Machine and typewriters, she encourages inmates to seek non-legal photocopies through Hobby Craft and Religious Services, both of which state that the Education Center Trust Fund Copier is where inmates are to make these copies. (see attached Exhibits 6 & 7 for Hobby Craft and Religious Services responses) This is a dead end.
 - Paragraphs #6 & #7 of SOE Howard's Response to the original Informal Complaint demonstrates that SOE Howard does recognize non-legal photocopies as an authorized activity but yet she refuses to allow inmates to pay for such copies through the Trust Fund copier and she refuses to perform these copies free of charge. As such, there is absolutely no way for inmates to duplicate non-legal but otherwise authorized docs.
- 7. The original BP-9 complaint to the Warden on this issue is dated 9/18/2023 yet the Response and Denial was not received until 12/7/2023. It is also true that the Warden's office received a massive amount of BP-9 complaints regarding this issue and that Warden Rivers is due to transfer to another prison very soon. But regardless of the actual reason for the extreme delay in the Warden's response, we have been experiencing daily ongoing harm due to the arbitrary restrictions around the Trust Fund Copy Machine and stand to incur more harm due to this extended delay and denial.
- 8. Attached is Exhibit #8 which details a relevant instance of this ongoing abuse.

As I had not yet received the Warden's Response/Denial to the original complaint regarding the restrictions governing the use of the Trust Fund Copy Machine and type-writers and because I had experienced a fresh instance of abuse on 11/20/2023 by SOE L. Howard while I was making copies of an authorized prison newsletter on the Trust Fund Copy Machine, I attempted to file an Informal Complaint about the incident along with supporting documentary attachments through Unit Counselor Sandles. Mr. Sandles cursed me and yelled at me to get out of his office while stating that he would not file my complaint which I had given him in the form of a proper BP-8.

I verbally complained about Mr. Sandles to AW Greenfield stating that I was being bullied, retaliated against and verbally abused by Mr. Sandles. AW Greenfield informed me that my alternative option is to file a "Sensitive" BP-9 to the Regional Office which I promptly did. However, the regional office sent the "Sensitive" BP-9 back to me THROUGH MY UNIT TEAM stating that "You Submitted Your Request Or Appeal To The Wrong Level. You Should Have Filed At The Institution...."

I have attached the "Sensitive" BP-9 filing as Exhibit #8 to show a very specific, egregious, and recent example of the ongoing abuses and harm surrounding the arbitrary restrictions that are imposed by the SOE over the Trust Fund Copy Machine and typewriters. These restrictions are impeding on my First Amendment ability to communicate with the outside media and other advocacy organizations. [Note: The "Sensitive" BP-9 was resent to the regional office with a letter emphasizing the sensitivity.]

9. In all fairness, it must be acknowledged that there was a very specific incident in July, 2023, that seemingly triggered SOE Howard's overeaction and subsequent defacto ban of all non-legal photocopying on the Trust Fund Copier. Staff had learned through an inmate informant that two inmates had plugged an electronic storage device into the USB port on the copy machine to print contraband. The offending inmates were sent to the disciplinary Special Housing Unit (SHU) as per the BOP disciplinary process that is in place to deal with and punish those that commit such infractions.

If this defacto ban is not lifted/remedied through this BOP Administrative Appeal process, I will file for a TRO or injunction in federal court so that this ban can be scrutinized under the Objective Reasonableness standard as there is a less restrictive alternative that could have been implemented and which would have prevented the collateral harm that the inmates who were not involved in the rule breaking are experiencing. This alternative is to simply unplug the USB port from the copy machine's electronic motherboard which would immediately render the USB port unusable to inmates. SOE Howard argues that inmates can still copy contraband that already exists in print and her argument is valid in the same way that because the chow hall serves fruit, inmates might make "hooch". But because there is a disciplinary process for individuals caught with "hooch", there is no reason to shut down the chow hall or to impose a defacto ban on fruit as that would be extreme, unreasonable and harmful.

Currently, this defacto ban is impeding my Freedom to Associate (particularly with the press) and it is violating my right to Equal Protection as other federal inmates are not subjected to this arbitrary restriction, i.e., inmates @ FCI-Elkton, USP Marion, et al.

Furthermore, SOE Howard is restricting and, at the very least, impeding access to the Courts and other governmental agencies. And although she is not trained in law or legal procedure, SOE Howard insists on being the sole arbiter of what constitutes "legal documents" and what doesn't. After her rejection of my request to copy a Library of Congress Copyright Application form and two copies of the original literary work that must accompany the copyright application as per the copyright application instructions, I respectfully informed SOE Howard that the application form and copies are, in fact, legal documents to which she snapped, "Well, they are not related to your federal criminal case." [Meaning the case for which I am serving time] She then added, "And you are not allowed to run a business from the BOP", implying that she equates the application for a copyright with running a business.

This arbitrary rule making/changing, sometimes on the spot, as well as the extreme restrictions in the hours that we can access the copy machine is creating havoc in our ability to meet filing deadlines in cases that she regards as "not legal" or "not related to your criminal case", i.e., civil and state court cases, US Tax Court/IRS cases, etc. Her own written Response to the Informal stage of this complaint in paragraph #5 demonstrates that she exclusively leans on P.S. 1315.07 as her authority in determining what she will allow to be copied. That P.S. states, in part, "The institution staff shall...duplicate legal documents if the inmate demonstrates that more than one copy must be submitted to the Court...". There is no reference to the copies that are required to be served upon opposing counsel and given our chronic problems with our outgoing/incoming prison mail, no original of any document (legal or not) can be trusted to be placed into the mail. This is just common sense and caution.

Because this SOE has become so extremely and minutely involved with every microscopic aspect of our photocopier needs and activities, and because she is not trained in law or legal procedure, and because P.S. 1315.07 Inmate Legal Activities is woefully inadequate for her to definitively rely on, she is now an unreasonable obstacle to the

Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 107 of 213 PageID 110

courts, government agencies, and the First Amendment.

On top of this, we have to contend with the chronic Education Center and Law Library closures due to staff shortages, a chronically unaccountable, sporadic, and undependable prison outgoing/incoming mail system that is also understaffed, and a SOE who often and arbitrarily changes her definition of "legal documents" according to how she feels on any particular day.

The attached documents will also show that SOE L. Howard has stated in front of me and witnesses that she does not allow immates to use the typewriters and photocopy machine for the creation and duplication of non-legal documents because inmates will use them for communications with "the newspapers" (referring to outside news organizations), which is an improper motive and violation of the First Amendment.

The enormity of this problem cannot be overstated as this Warden has received over 100+ complaints since September, 2023, about this problem according to his assistant, Ms. Burnham. The Warden has also stated during Main Line that he has been inundated with these complaints yet he has declined to remedy the problem and he is transferring very soon out of this facility which might be part of the reason for the capitulation.

It would seem that the sheer volume of complaints within such a short time concerning one problem caused by one BOP staff memeber would generate some concern regarding penalogical threats to security. To describe this SOE as vastly and incredibly "unpopular" would be to minimize and sugar-coat the truth.

12/9/2023

Randall Morris #15141010

FCI-Seagoville

Attachments

BP-9 with Warden Response (Remedy #1182687-F1)

BP-8 Informal Resolution Form (9/6/2023)

Response to IRF from SOE L. Howard

Evidence Exhibit #1 SOE Memorandum containing threat (6/13/2023)

Exhibit #2 SOE Memorandum restricted copy machine access schedule (8/30/2023)

Exhibit #3 P.S. 1315.07, Inmate Legal Activities

P.S. 5350.27, Inmate Manuscripts

Exhibit #4 Morris Trulincs message to SOE Howard (9/4/2023)

Exhibit #5 Morris Trulincs message to Trust Fund (9/4/2023)

Exhibit #6 Morris Trulincs message to Recreation (10/6/2023)

Exhibit #7 Morris Trulincs message to Religious Services (10/6/2023)

Exhibit #8 "Sensitive" BP-9 (Remedy #1182441-R1) filed due to a new instance of the same complaints and abuses described in Remedy #1182687-F1. However, this new instance includes additional complaints of verbal abuses and retaliation while attempting to file the new complaint and it attaches new documentary evidence pertaining to the restrictions on the Trust Fund Copy Machine.

RANDALL ALLEN MORRIS, 15141-010
SEAGOVILLE FCI UNT: 6 GP QTR: F02-228L
2113 NORTH HWY 175
SEAGOVILLE, TX 75159

RECEIVED WARDEN'S OFFICE

MAR 0 8 2024

FCI SEAGOVILLE

Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 109 6 213 Page 17/127

REJECTION NOTICE - ADMINISTRATIVE REMEDY

DATE: DECEMBER 21, 2023

FROM: ADMINISTRATIVE REMEDY COORDINATOR

SOUTH CENTRAL REGIONAL OFFICE

TO : RANDALL ALLEN MORRIS, 15141-010

SEAGOVILLE FCI UNT: 6 GP QTR: F02-228L

2113 NORTH HWY 175 SEAGOVILLE, TX 75159

FOR THE REASONS LISTED BELOW, THIS REGIONAL APPEAL
IS BEING REJECTED AND RETURNED TO YOU. YOU SHOULD INCLUDE A COPY
OF THIS NOTICE WITH ANY FUTURE CORRESPONDENCE REGARDING THE REJECTION.

REMEDY ID : 1182687-R1 REGIONAL APPEAL

DATE RECEIVED : DECEMBER 19, 2023

SUBJECT 1 : OTHER INSTITUTION PROGRAMS

SUBJECT 2 : INCIDENT RPT NO:

REJECT REASON 1: YOU MAY ONLY SUBMIT ONE CONTINUATION PAGE, EQUIV. OF ONE

LETTER-SIZE (8.5 X 11) PAPER. TEXT ON ONE SIDE. THE

TEXT MUST BE LEGIBLE.

REJECT REASON 2: YOU DID NOT SUBMIT PROPER NUMBER OF CONTINUATION PAGES

WITH YOUR REQUEST/APPEAL. 2 - WARDEN'S LEVEL; 3 -

REGIONAL LEVEL; AND 4 - CENTRAL OFFICE LEVEL. THE

NUMBER CITED INCLUDES YOUR ORIGINAL.

REJECT REASON 3: YOU MAY RESUBMIT YOUR APPEAL IN PROPER FORM WITHIN

15 DAYS OF THE DATE OF THIS REJECTION NOTICE.

The original BP-10 had a four page expanded narrative that was attached. I have modified that to come into compliance with this rejection and the new one page expanded narrative is attached.

Randall Morris

1/10/2024

MECEIVED WARDEN'S OFFICE JAN 1 U 2024

CL SEAGOVILLE

rejection further confirms that I just received it. signed for this rejection today, 1/10/2024, through Ms. This rejection states that I have 15 days from the date of this rejection (Dec. Sims at Unit Team and the Warden's office stamp at the bottom of this 21) to resubmit. However, I just received and

PART A:BP-10 APPEAL (Remedy #1182687)

1. In Paragraph #2 of Warden's Response , the Trust Fund Photocopy Machine is referred to by the Warden as "the legal copier", however, the term "legal copier" is found nowhere in the PS 4500.12 Trust Fund/Deposit Fund Manual or any other guiding BOP publication. In fact, PS 4500.12 specifically refers to the copy machine as "Inmate Copier Service", "Copier Service", and "Copier". Furthermore, PS 1315.07 refers to the copy machine as "Institution copying equipment" and "copy vending machines".

2. Paragraph #2 of Warden's Response cites paragraph "g." of PS 1315.07, Inmate Legal Activities, to argue that PS 1315.07 limits the use of the copy machine to only legal documents and Paragraph 3. of Warden's Response attempts to explain the particulars of his argument. However, it appears that Warden is erroneously asserting that the "one source" provision in the Directives Management manual permits staff to rely on a single paragraph found in a single PS while ignoring all other applicable provisions in other program statements to create arbitrary & capricious restrictions of immates' use of other authorized services, programs, and activities. One of the primary purposes of the Bureau's program statements is to provide implementation instructions for codified programs under the provisions of Title 28 of the Code of Federal regulations that were written for the FBOP. As such, the relevant provisions of 28 CFR are included within each PS so that staff can rely on the program statements as the single source for guidance, as is established in PS 1221.66, Directives Management Manual, Chapter 3, §3.1, rather than requiring staff to look up the relevant CFR provisions for guidance, hence, the "one source" verbiage.

3. Paragraph #6 & #7 of SOE Howard's Response to the original Informal Complaint (attached) demonstrates that despite SOE Howard's restrictions on the Trust Fund Copy machine and typewriters, she encourages inmates to seek non-legal photocopies through Hobby Craft and religious Services, both of which have stated that the Education Center Trust Fund Copier is where immates are authorized to make these copies. (See attached Exhibits 6 & 7 for these responses) This is a dead end. Paragraphs #6 & #7 of SOE Howard's Response to the original Informal Complaint demonstrates that SOE Howard recognizes non-legal copies as an authorized activity but yet she refuses and restricts immates from making and paying for these copies on the Inmate Trust Fund Copy Machine.

4. The attached Exhibit #8 details a relevant instance of this ongoing abuse as well as a documented attempt by staff to prevent me from filing a complaint on it.

5. It must be acknowledged that there was a very specific incident in July, 2023, that seemingly triggered SOE Howard to implement the restrictions on the immate copier. Staff had learned through an immate informant that TwO immates had plugged an electronic storage device into the USB port on the Trust Fund copier to print contraband. The offending immates were sent to the SHU per disciplinary processes that are in place to deal with such infractions. The restrictions that SOE Howard out onto the Trust Fund copier after this incident were not the lease restrictive means to prevent the copier from being misused in this way as the USB port can simply be unplugged from the motherboard within the chasis of the copier to render the auxillory port inoperative or a request could have been made to the vendor to replace the copy machine with one that does not have auxillory ports available or operative. SOE Howard argues that inmates could still copy contraband that already exisits in print and that argument is in the same way that because the chow hall serves fruit, immates might make "hooch". But because there is a disciplinary process for individuals caught with "hooch", there is no reason to shut down the chow hall or to impose a defacto ban on fruit. 6. This arbitrary, abusive, and excessive defacto ban on immates using the Trust Fund Immate Copier is contraryinto PS 5350.27, Inmate Manuscripts, and it is in violation of the Administrative Procedure Act. Furthermore, it is impeding inmate access to the courts and other governmental agencies as this SDE is not trained in law but is now making on the spot decisions as to what constitutes "legal documents" and what does not. And quite often, she get's this wrong, i.e., her recent denial of my request to copy a Library of Congress Copyright Application along with the required copies of the original literary work that must accompany the copyright application. In denying to allow me to make the copies using my purchased Trust Fund Copy Card, she added, "And you are not allowed to run a business from the BOP" as if she equates applying for a copyright with running a business. THIS MUST STOP! 7. The attached EXHIBITS will show that SOE Howard has stated in front of me and witnesses that she does not allow immates to use the typewriters and Trus Fund Copy machine for the creation and dublication of non-legal documents because inmates will use them to communicate with "the newspapers" (referring to outside news organizations), which is an improper motive. The enormity of this problem cannot be overstated as this worden, who is due to transfer soon and loathe to get involved, has received over 100+ complaints about this issue since SOE Howard implemented it only 8/31/2023. It is a wonder that the volume of complaints has not yet triggered a security concern.

Randall Morris #15141010

1/10/2024

Neibell (CILIS #15141616

Regarding the attached documents and exhibits, Exhibit #8 is included as it is a copy of a "Sensitive" 8P-9 that I had attempted to file due to a new instance of the above problem but was yelled and cursed at when I had attempted to file it. However, regional rejected it so it is now a pending "Sensitive" 8P-11 @ Central Office.

REJECTION NOTICE - ADMINISTRATIVE REMEDY

DATE: JANUARY 24, 2024

FROM: ADMINISTRATIVE REMEDY COORDINATOR SOUTH CENTRAL REGIONAL OFFICE

TO : RANDALL ALLEN MORRIS, 15141-010 SEAGOVILLE FCI UNT: 6 GP QTR: F02-228L

SEAGOVILLE, TX 75159

made 3 more copies of extended vormation + sent ou on 2/1/2024

IS BEING REJECTED AND RETURNED TO YOU. YOU SHOULD INCLUDE A COPY OF THIS NOTICE WITH ANY FUTURE CORRESPONDENCE REGARDING THE REJECTION. FOR THE REASONS LISTED BELOW, THIS REGIONAL APPEAL

REMEDY ID : 1182687-R2 REGIONAL APPEAL DATE RECEIVED : JANUARY 19, 2024

SUBJECT 1 : OTHER INSTITUTION PROGRAMS

SUBJECT 2 :

REJECT REASON 1: YOU DID NOT SUBMIT PROPER NUMBER OF CONTINUATION PAGES 2 - WARDEN'S LEVEL; 3 -REGIONAL LEVEL; AND 4 - CENTRAL OFFICE LEVEL. NUMBER CITED INCLUDES YOUR ORIGINAL. WITH YOUR REQUEST/APPEAL.

REJECT REASON 2: YOU MAY RESUBMIT YOUR APPEAL IN PROPER FORM WITHIN 15 DAYS OF THE DATE OF THIS REJECTION NOTICE.

Regional Administrative Remedy Appeal No. 1182687-R3 Part B - Response

This is in response to your Regional Administrative Remedy Appeal received on February 7, 2024. You appeal the Warden's response to your administrative remedy. You request the institution provide greater access to the inmate typewriter and copy machine and for inmates to be permitted to make copies of material unrelated to legal activities.

In your Remedy Appeal, you acknowledge inmates have access to the typewriter and copy machine. Program Statement 1315.07, Legal Activities, Inmate explicitly states, "Unless clearly impractical, the Warden shall allow an inmate preparing legal documents to use a typewriter." The policy further states, "The institution staff shall, upon an inmate's request and at times scheduled by staff, duplicate legal documents if the inmate demonstrates that more than one copy must be submitted to court and that the duplication cannot be accomplished by use of carbon paper." As such, use of a typewriter and copy machine is intended for legal documents only. This standard appears to have been met.

Based on the information above, this response is for informational purposes only.

If you are dissatisfied with this response, you may appeal to the Office of General Counsel, Federal Bureau of Prisons, 320 First Street, NW, Washington, DC 20534. Your appeal must be received in the Office of General Counsel within 30 days from the date of this response.

Date 2 2 2024

Heriberto M. Tellez

Regional Director

U.S. D@@Ben80244stw-03148-X1BW Document 3 FileGen2taB/Office Administrative 1Bendelygleppetal 6

nents must be submitted with this appeal.	ies. One copy each of the completed	BP-229(13) and BP-230	(13), including any attach-
Morris, Randall A	15141010	F-10	FCT-Seagoville
LAST NAME, FIRST, MIDDLE INITIAL	REG. NO.	UNIT	INSTITUTION
ppealing the enclosed response int in light of P.S. 5350.27, isinterpretation/misapplication he basis of the complaint. he restrictions complained of,	Inmate Manuscript n of the "one sou herein, harm not	s or this i provisting only the l	nstitution's ion, which is ,600 inmates @
CI-Seagoville, but also the far hird parties that have an inter ocuments from these inmates and	rest in receiving	g typed and/	or duplicated
3/13/2024			
DATE		SIGNATURE C	F REQUESTER
art B - RESPONSE			
art B - KESPONSE			
DATE		GENERAL	COUNSEL
DATE		GENERAL CASE NUMBE	
DATE PRIGINAL: RETURN TO INMATE			R:
DATE RIGINAL: RETURN TO INMATE	REG. NO.	CASE NUMBE	R:

REJECTION NOTICE - ADMINISTRATIVE REMEDY

DATE: APRIL 4, 2024

FROM: ADMINISTRATIVE REMEDY COORDINATOR

CENTRAL OFFICE

TO : RANDALL ALLEN MORRIS, 15141-010

SEAGOVILLE FCI UNT: 6 GP QTR: F02-228L

2113 NORTH HWY 175 SEAGOVILLE, TX 75159

FOR THE REASONS LISTED BELOW, THIS CENTRAL OFFICE APPEAL IS BEING REJECTED AND RETURNED TO YOU. YOU SHOULD INCLUDE A COPY OF THIS NOTICE WITH ANY FUTURE CORRESPONDENCE REGARDING THE REJECTION.

REMEDY ID : 1182687-A1 CENTRAL OFFICE APPEAL 3/8

DATE RECEIVED : MARCH 28, 2024

SUBJECT 1 : OTHER INSTITUTION PROGRAMS

SUBJECT 2 : INCIDENT RPT NO:

REJECT REASON 1: YOU DID NOT PROVIDE A COPY OF YOUR INSTITUTION
ADMINISTRATIVE REMEDY REQUEST (BP-9) FORM OR A COPY

OF THE (BP-09) RESPONSE FROM THE WARDEN.

REJECT REASON 2: YOU MAY RESUBMIT YOUR APPEAL IN PROPER FORM WITHIN

15 DAYS OF THE DATE OF THIS REJECTION NOTICE.

RECEIVED WARDEN'S OFFICE

APR 1 5 2024

FCI SEAGOVILLE

4/22/2024

Randall Morris #15141010 Federal Correctional Institution P.O. Box 9000 Seagoville, TX 75159-9000

FBOP Central Office 320 lst St NW Washington, DC 20534

Regarding your 4/4/2024 rejection of my BP-11 citing "You did not provide ... a copy of the (BP-09) Response from the Warden", I did, indeed, provide the Warden's Response. It was directly behind the BP-9 complaint in the packet that you reurned to me. [This is very frustrating as this now requires unnecessary and burdensome postage to mail this back to you]

To better draw your attention to this document, I have affixed a paperclip to it and returned it to it's sequential place within the enclosed stack of documents and just as I had previously sent it to you in the first place.

<-->

Randall Morris

RECEIPT - ADMINISTRATIVE REMEDY

DATE: MAY 21, 2024

FROM: ADMINISTRATIVE REMEDY COORDINATOR

CENTRAL OFFICE

TO : RANDALL ALLEN MORRIS, 15141-010

SEAGOVILLE FCI UNT: 6 GP QTR: F02-228L

THIS ACKNOWLEDGES THE RECEIPT OF THE CENTRAL OFFICE APPEAL IDENTIFIED BELOW:

REMEDY ID : 1182687-A2 DATE RECEIVED : MAY 3, 2024

RESPONSE DUE : JUNE 12, 2024 SUBJECT 1 : OTHER INSTITUTION PROGRAMS SUBJECT 2 :

Ad Rem 2

Counselor's Signature:

Unit Manager Review:

SEA 1330.18(c) Administrative Remedy Program June 1, 2017 Attachment 1

Federal Correctional Institution Seagoville, Texas

s prior to filing a formal written	
s prior to filing a formal written	complaint. This form will be used to documen
formally resolve your complain	ıt:
complaint represents a r f this sort have been doo	new instance of abuse and cumented and filed through in relief from these abuses.
nt to the BOP Inspector	General.
BOP Program Statement rese abuses, deprivations,	egarding Inmate Manuscripts and humiliations.
15141010	F-10
Register Number	Unit
11/17/2023	
Date	
CC	
statt contacted:	
2	
n(Date)	
1	f this sort have been docorms but did not result in the BOP Inspector BOP Program Statement rese abuses, deprivations, 15141010 Register Number

Date:

Date:

Inmate Signature

11/17/2023 @ approx. 0830 hrs

FCI-Seagoville Education Center

I was in the Education Center building making photocopies at the Trust Fund copy machine using a copy card that I had purchased from commissary (receipt attached to enclosed essay), when SOE L. Howard and Ms. Bullock entered and observed me at the copy machine.

In front of 4 (four) inmate witnesses and Ms. Bullock, SOE Howard aggressively yelled, "What are you copying?!", to which I responded that I was copying the most recent edition of The Seagoville Bars & Stripes military veterans' newsletter (copy attached) and of which I am the authorized editor and on which appears the approval stamps of Associate Warden of Programs, Aaron Greenfield. [SOE Howard is well aware of this newsletter and authorization for me to create & distribute it around the compound. (See attached essay)]

When SOE Howard asked who had authorized me to make copies of this newsletter on the Trust Fund copier, I correctly replied that the First Amendment of the US Constitution and BOP Program Statement 5350.27 authorizes and encourages me to create, duplicate, and mail this material and that §551.81 of that P.S. specifically states that I do not need BOP staff approval for this activity. I also stated that I had, in fact, showed these documents to Ms. Bullock for approval the previous day but was unable to complete the copies due to an empty copy card which I remedied on 11/17 and recommenced to complete the copies.

SOE Howard inspected the attached newsletter and then declared that I am not authorized to make copies of it as "the typewriters and Trust Fund copier are for legal documents only." Then, in a disturbingly emotional display of unhinged anger, SOE Howard unplugged the copier and shoved it into an unused office before locking the office door in order to prevent inmate access to it.

It is a fact that the Trust Fund copy machine is the only copier that inmates have access in which to pay for copies and SOE Howard is preventing it. It is also a falsehood that inmates can go to Religious Services or Hobby Craft to obtain copies. (See attached) This falsehood has been repeatedly given in Howard's written responses to almost 100 complaints against her since Sept., 2023, and which are currently pending BP-9 responses from the Warden. In fact, there are so many formal BP-9 complaints regarding the abuses of Howard, that it is difficult to understand how this has not yet become a penalogical security concern especially in light of the current and severe shortage of BOP staff.

I was making copies of the prison newsletter to share with interested outside organizations that I maintain First Amendment relationships with, i.e., Disabled Veterans Magazine, University of Texas Jail & Prison Innovation Lab, Prison Policy Iniative, etc. Howard's consistant position on this is that, "You can hand copy them. Legal documents only."

SOE Howard is arbitrarily inhibiting and, at the very least, degrading our ability to timely create, duplicate, and share readable/presentable/publishable documents and manuscripts through her self-made "policy" that she posted on 8/30/23, severely restricting our access hours and the purposes for which the typewriters and copy machine can be used. Furthermore, Howard is now violating P.S. 1315.07 (which she relies on and which states that the duplication of documents "shall be done so as not to interfere with regular institution operations") as she frequently stops her SOE duties to personally grant/deny copier use and then "helicopters" behind each inmate until the copies are made so that she can lock the copier away again. This is particularly egregious when considering that we have no college courses or Pell Grant correspondence course alternatives and Howard just lost two more staff which has caused even more Education evening and weekend closures with no make-up copier time to compensate for her already restrictive access schedule and deprivations. And this is in addition to the losses of law library time for legal work.

The full history of my complaints and attachments have been sent to the BOP Inspector General and to a lengthy list of other watchdog/advocacy organizations for publication.

Randall Morris 11/17/2023

November 13, 2023

No. 8

Veterans In Custody Housing Unit Dedication

Powered by an experimental idea from the FCI-Seagoville Associate Warden of Programs, the culmination of five and a half months of designing, repairing, painting, stripping, waxing, excavating, landscaping, military themed frescoe renderings and flag installations came to a reverent pause for the formal dedication ceremony on November 13, 2023.

The dedication of the Veterans In Custody (VICS) Housing Unit began with a heartfelt address by Chaplain Schanfish about what freedom and veterans mean to him before he led the group into the Invocation. This was followed by FCI-Seagoville Warden Chris Rivers thanking Associate Warden Aaron Greenfield (AW) and the resident VICs for all of the effort that went into making this special housing unit happen and he emphasized that the VICS Unit has exceeded his expectations without any significant burden on the budget. Warden Rivers concluded by stating, "I know that incarceration can be hard but I hope that this unit will provide you some comfort and support."

The architect and patron of the VICS Unit, Associate Warden Aaron Greenfield (AW), addressed the VICs with, "You are appreciated" before reciting the following passage by Syndy Sweeney:

Dear Veterans,
Those of us who have not served
will never fully understand
the sacrifices you've made
both in times of peace and war.

We will never fully understand what you were required to do or how you were able to do it.

We will never fully understand the depth of your scars.

But we can offer you this:

We see you.

We recognize your humanity.

And we send you Love that is gentle, patient and healing.

With Blessings and Gratitude, we ask that you remember you are loved.

Thank you.



Before introducing the special guest speaker, AW reminded the VICs that the FCI-Seagoville VICS community should be a point of pride and that the VICS Housing Unit is "A place where honor can be restored." AW then introduced Mr. Geno Thompson from the Department of Veterans Affairs who spoke to the VICs about VA counseling, re-entry programs, housing concerns/issues and VA monetary and healthcare benefits.

The dedication was concluded with a sheet cake and individual discussions between VICs and Mr. Thompson and between VICs and executive staff.

FCI-Seagoville VICs appreciate Mr. Thompson for his attendance and ongoing support.

History & Summary Of VICS Unit

In May, 2023, FCI-Seagoville Associate Warden Aaron Greenfield began the process of establishing a special military veterans' housing unit and program that provides a safer living environment as well as special veterans' specific programming with re-entry focus and amenities. The only requirements to move into this special housing unit are 1.) the inmate must be an honorably discharged military veteran and 2.) the inmate must adhere to an elevated standard of conduct.

Some of the benefits of this unique veterans' unit and program are:

- * Increased inmate safety & cohesion due to shared history, experiences, training, etc.
- * Group awareness of and peer support for resident veterans that are at risk for depression and suicide (Veterans are in the highest risk group)

* Special "Veteran" identification lanyards

- * Veteran specific First Step Act programming (Soldier On & Resilience)
- * 2 man rooms in the VICS Unit vs. 4 6 man rooms in general population
- * A dedicated outside courtyard for the exclusive use of VICs
- * Pre-sign up for some education classes
- * Special commissary items available only to VICs
- * New mattresses
- * Hiring preference
- * Re-entry info and assistance through coordinated visits from outside veterans organizations and government agencies

This prototype veterans' unit is the only one of its kind in the Bureau of Prisons and it has been so successful that the BOP South Central Regional Director, Heriberto Tellez, remarked during a recent walk-through that he intends to explore expanding this concept to other BOP prisons within the region.

As there are around 200 military veterans incarcerated at FCI-Seagoville, this program stands to support and benefit a significant number of veterans that want to restore honor.

Dallas College Coming Back

On October 5th, 2023, Professor Steven Drayton from Dallas College travelled to FCI-Seagoville on his day off to give the VICs a first peek presentation of the new classes that Dallas College will be offering through the Education Center beginning in January, 2024. Prof. Drayton is also a military veteran and was more than happy to answer the AW's call to come and address the VICs.

According to Prof. Drayton, Dallas College will begin offering a Certificate program in

Logistics and possibly an Associates degree in Logistics when the new semester starts. According to Prof. Drayton, the average wage in logisits is currently \$25 per hour and as the Covid pandemic recently demonstrated, supply matters. He also mentioned that HVAC and Automotive courses may be added.

VICs will get a headstart on the sign-up for all of these courses and your military service can be counted as some credit by Dallas College. Furthermore, the school will assist you in determining what previous college credit can be applied to these courses and Prof. Drayton will follow up with SOE Howard on the applicability (if any) of the new Pell Grant for Inmates that went into effect on July 1, 2023, according to information that was recently obtained by The Bars & Stripes from the US Department of Education.

Probation must build a profile on every inmate before the inmate is released. This profile will include everything that you did while you were in the BOP, i.e., completed courses, degrees, disciplinaries, etc. Using this time to stuff your profile with courses will not only help you with Probation, it will help to overcome some of the stigma of being a felon looking for employment. And according to Prof. Drayton, Dallas College will also help you find employment if you earn a certificate or degree from them.

Dog Program

There is no new information on the possibility of the VICs getting responsibility of a BOP Dog Program at FCI-Seagoville despite that the VIC's desire to have such a program has been communicated repeatedly to the local and regional administration as well as outside organizations. However, AW is still working on getting an outside vet organization to bring in some dogs for a day sometime before Christmas.

Veterans Re-entry Homelessness Concerns

VA Outreach Program Specialist, Geno Thompson, was kind enough to email the AW after he had returned to his office after he had addressed the VICs during the dedication ceremony to inform the AW that quite a few VICs had expressed their fears/concerns with not being able to find housing upon release due to their convictions and/or requirement to register. Mr. Thompson wanted to assure all VICs that the VA can help with this issue.

Randall Morris, Editor VICS Unit #10 - Room #228

OFFICE

Paying For Much More Than Our Life's Mistakes

This essay was expensive and tedious to create. Just to begin writing it required an original investment of exactly \$25.45, which is just under the \$30 per month that the Federal Bureau of Prisons is legally allowed to pay me for my prison labor under the slavery exception clause of the Thirteenth Amendment of the U.S. Constitution.

Then, each subsequent keystroke and each correction whittled away at that investment. The only alternative to this cost is to write it by hand but that would degrade the intended impact and presentation much like showing up for a job interview dressed in gardening attire would. In fact, the Supreme Court recognized the depth of presentation bias when it held that an inmate in a civil case does not have to appear before a jury dressed in jail or prison garb due to the prejudicial effect that such a presentation can evoke. (Estelle v. Williams (1976))

Unfortunately, the volume and quantity of my essays, pro se legal filings and college correspondence course work reduces this investment to \$0 surprisingly fast requiring further investments of \$25.45 ad infinitum, or at least for as long as I have a need and desire to create presentable and readable documents. And once my documents are finished, there is no way for me to save my work for future edits or to copy & paste from my documents despite the exhorbitant cost that I incur to create them.

The Swintec® 7000 User's Manual confidently states that, "Your new Electronic Typewriter increases your typing efficiency through the use of the most advanced technology." This statement was quite likely true when Sputnik was launched but it is now the fourth quarter of 2023 and if it were not for my incarceration at FCI—Seagoville, I could simply go to the local library to digitally create and save my work free of charge or, I could speak it into existence and digitally save it using Artificial Intelligence. Speaking of which, the fact that I am incarcerated is some measure of assurance that this essay is original and not created by AI.

In 2022, the FCI-Seagoville inmate commissary sold the following ribbons for the Swintec® 7000 typewriters:

Adler-Royal

Black Correctable Typewriter Ribbon Product No. 285 \$ 8.95

No Name Correction Ribbon (manufacturer & item # unknown) .90

In the fourth quarter of 2022, the retail.price of that typewriter ribbon dramatically jumped to \$15.60 and the correction ribbon jumped to \$3.90. (See attached sales receipts reflecting all of these prices and dates)

Then, in the summer of 2023 (less than one year later), the typewriter ribbon price soared again to \$21.55 but this time the ribbon seems to be coming from a different reseller according to the sticker affixed to the ribbon cellophane packaging that reads: "AROUNDTHEOFFICE.COM REORDER NUMBER SC-800-COM 1-800-816-6855." These exponential retail price hikes are particularly and suspiciously egregious considering that the FCI-Seagoville Education Center is internally paying only \$10 for the actual manufacturer's ribbon. (Swintec 7000 Ribbon Re-Order #: SWS 1009)

Meanwhile, almost one year ago FCI-Seagoville took delivery of BOP authorized word processors that would solve this problem but the current Supervisor of Education ("SOE") at FCI-Seagoville has so far failed or refused to install them despite that she had been criticized in April, 2023, by a visiting federal judge (Josh Duggar's sentencing judge) after he had expressed shock at seeing typewriters in use in her education building. All the while, the word processors have been collecting dust in a storage room while inmates struggle to afford typing ribbons.

This same SOE has recently imposed arbitrary and extreme restrictions on inmate use of the BOP typewriters and Trust Fund photocopy machine which are all kept in her Education Center building. (Inmates purchase photocopy cards from Trust Fund/Commissary at \$6.50 for 50 copies) These restrictions include an impossible schedule of only one hour per day access to the copy machine which is then rendered even more restrictive by the incessant weekly Education Center closures due to staff shortages and three recent "Going Away" parties for BOP staff. There are no make-up copy sessions scheduled to offset these closures as this SOE does not consider that pro se inmates have filing deadlines with the court and other urgent legal needs.

Furthermore, this SOE has crafted an arbitrary self-made "policy" that now dictates that the typewriters and photocopy machine are for "legal documents only" which is contradictory to BOP Program Statement 5350.27 which encourages inmates to create and duplicate manuscripts, fiction, nonfiction, poetry, music/lyrics, college correspondence course work, religious materials, etc. Worse yet, this SOE frequently changes her definition of "legal documents" when determining whether to allow use of the machines by often declaring that "the legal documents must be related to the inmate's criminal case" to type or duplicate them. To everything else, her pat response is that, "you can write it by hand."

This arbitrary and unsupported "policy" was recently tested when an inmate requested to use the copy machine to photocopy a Copyright Application Form and to make the two copies of the original literary work that is specified in the U.S. Copyright Office instructions that accompanied the copyright application. The SOE denied the inmate use of the copy machine for these copies stating that "they are not legal documents." When she was respectfully told that they are, indeed, considered to be legal documents, she replied that, "they are not related to your criminal case." She further exposed her unstable rationale by adding, "And, you are not allowed to run a business from the BOP", seemingly implying that she equates applying for a copyright with operating a business.

When asked to copy some paralegal correspondence course work before sending the originals in the mail to the school, the SOE responded that she might allow the copies to be made if the inmate can provide her with "a letter from your school showing that the school requires students to make copies before mailing course work." No school would write such a ridiculous letter as it is commonsense to make a copy before mailing anything in the mail.

This SOE recently posted a sign in the Education Center threatening disciplinary action against inmates who use the typewriters for anything other than legal docs. When an inmate was subsequently asked what he was typing on the typewriter his response was, "A Prison Release Plan, mam." To which she shrilled, "Not on my watch! Legal documents only!"

I would like to point out that FCI-Seagoville is a **low security** prison and the current cultural shift and political push for domestic prison reform is reflected in the stated goals of the 2018 First Step Act as well as the stated objectives of the new BOP Director, Colette Peters. The emphasis is heavy on rehabilitation, programming, productive activity engagement and community re-entry. And the empirical data

PageID 126

compiled since the signing of the First Step Act show that the rehabilitative approach is working if the lower recidivism rates since 2018 are any indication. (Sweden and Norway are wondering what took the U.S. so long to figure this out)

Against this positive backdrop, the tyrannical abuses and restrictions imposed by this SOE are akin to a self-righteous but retarded salmon swimming all alone in the wrong direction against the current of all the other fishes. And, frighteningly, she does not appear to be aware that she is alone. Furthermore, while the SOE occupies herself with arbitrary "policy" making and Gestapoesque enforcement of her restrictions while under severe staff shortages, the FCI-Seagoville Edumacation (sic) Center has not and does not offer any college classes although it has plans to offer a vocational class in 2024 for those interested in trade school. For everybody else it is a barren wasteland of unused potential and abuses.

How is it, you might be asking, that YOU have typed this essay if this tyranny is as omnipotent and prevalent as YOU say that it is? That is a fair but anticipated question. After being selected by the Associate Warden to be the editor of a new incarcerated military veterans' newsletter (The Bars & Stripes), the SOE refused to allow me to use the Education Center's typewriters to create the newsletter (I have since published seven editions) so, the local facility administration assigned me a BOP typewriter for my room against the vehement and emotional protestations from the SOE. (I am the only inmate at this facility with a typewriter but there used to be a typewriter in every housing unit until this SOE recently removed them) The SOE's stated reason for denying my use of "her" typewriters to type the newsletter in the first place was [QUOTE], "If I let you use the typewriters for that then I will have to allow everyone to use them for non-legal typing and then they will start writing the newspapers." (Referring to the outside news organizations)

Not only is her distorted reasoning an improper motive, it is nonsensical in that nothing could be more impactful to the outside newspapers than for us to be reduced to writing on napkins with crayons in order to communicate these abuses. I can only imagine how awesomely urgent the words "Please help us!" would look scrawled in bright red on a napkin. Her restrictions do not prevent this communication. They, in fact, encourage it, hence, the energy and expense I have put into this essay. Simply put, there is no penalogical or official BOP policy or other justification for these unreasonable humiliations and restrictions that are preventing inmates from timely creating and filing federal and state civil, criminal and tax court obligations and also preventing the creation and duplication of presentable non-legal literary works that are described and encouraged in BOP P.S. 5350.27 which has been in effect since 1999 and states that inmates do not have to have BOP staff approval of these non-legal creations. Furthermore, the inmates pay for these creations through photocopy cards and typewriter ribbons.

Having said all of that, I must disclose that I am privy to the SOE's sensitivity to what is written in the press about her and her Education Center because one of my op-ed pieces came to her attention when it was published online by the Vanguard Incarcerated Press (davisvanguard.org) and others in May, 2023. It was titled "BOP Offers Higher 'Degrees'" and described the lack of education offerings at FCI-Seag-oville but then went on to tout the intensity of the "Degree Program" that I was immersed into when I was put into a housing unit of 180 men with NO AIR-CONDITIONING and only five functioning showers...in Texas! To see just how intense that degree program was, simply Google the 2023 Texas summer temperature history which set records in both temps and consecutive duration.

So, yes, I have a typewriter on which I am able to create the Bars & Stripes news-letter as well as my legal and non-legal literary works.

As an absurdist humorist and non-fiction writer, I write with the idea of not only sharing my experiences, views and humor with the outside world while I am incarcerated, but also with an eye toward eventually publishing them in a collective volume. This is a BOP authorized productive activity and it is totally reasonable that I will want to produce them in a presentable form especially for the purpose of the copyright application process.

I also have several civil cases in federal court and before the US Tax Court in which I am acting pro se (representing myself) and which require timely, presentable and readable court filings. I am also engaged in a paralegal certification correspondence course which requires that I create presentable and readable lesson work and, due to caution and commonsense, that I photocopy my open book test sheets and course work before I send them through the mail to the school for credit. On this point, it is interesting that the SOE had recently informed me that she could write me a disciplinary for my having signed up for the correspondence course without first seeking her permission. That's right! For my having had the audacity to take it upon myself to pay for and import my own educational curriculum into this barren educational wasteland, this woman threatened to sully my sterling six year history of good behavior! At least she has priorities.

We could learn a lot from Norway and Sweden in how to better rehabilitate and treat the incarcerated and it is in the interest of the community that we do so as most inmates will ultimately be released back into the community. What kind of releasee would you like to move in next door to you? It is probably safe to say that you would strongly prefer someone who had not been simply warehoused for years while being arbitrarily deprived of basic growth opportunities by overlords that inhale, savor and wallow in their artificial power like high grade catnip.

There is a prolific group of incarcerated writers at this facility with some having previously had press credentials. Collectively, we, as a group of similarly concerned and affected inmates, recently began a concerted effort to obtain relief from these abuses. This effort included a writing campaign to the Office of the Inspector General, the DOJ Civil Rights Litigation Div., the BOP South Central Regional Office, BP-9 Grievances filed with the Warden's office and Tort Claims filed with the regional office claiming purchased photocopy cards that were rendered useless by the SOE's "policies" restricting the use of the copy machine that were enacted without notice.

So far, these efforts have generated nothing more than a continuous chorus of crescendoing cricket chirps. However, we fully intend to exhaust the rest of the available administrative remedies as per the PLRA so that we can petition the federal court for an injunction if all of our other efforts fail to gain relief.

It never fails to amaze and nauseate me that when the volume of Lee Greenwood is cranked to maximum, the patriotic crowds are unquestioningly moved to subjective tears and the blowing of snot bubbles as they mindlessly mumble along to the high fructose lyrics that hypnotize them into believing that they live in a land that is free from tyranny. But for many of the incarcerated, there is a contradiction that is as blatant as 4th of July festivities at Abu Ghraib. (Nothing to see here, folks. Please move along.)

Randall Morris FCI-Seagoville, Texas 10/22/2023

I ACT NAME FIDET MIDDLE INITIAL

U.S. DEPARTMENT OF JUSTICE

Federal Bureau of Prisons

SENSATIVE BP-10

REQUEST FOR ADMINISTRATIVE REMEDY

Type or use ball-point pen. If attachments are needed, submit four copies. Additional instructions on reverse. Morris, Randall A. 15141010 F-10 FCI-Seagoville LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION SENSATIVE Part A- INMATE REQUEST I am being retaliated against due to my previous filing of similar abuses by the SOE, L. Howard, and I fear further retaliation if I push to file this due to the fact that I was yelled at by Unit Counselor Sandels this morning and told to "Get out of my office" when I attempted to file the attached Informal Resolution Form through him. When I reported this to the Associate Warden, Aaron Greenfield, this morning, he advised me to file this Sensative BP-9. Furhtermore, Warden Chris Rivers has stated to me that he has received a very large number of complaints regarding the abuses described in my attached complaint and that he will be denying all of them so filing this complaint to the warden would be futile. I want to clarify that I had filed a BP-9 with the warden regarding similar previous abuses by SOE Howard and I am still waiting for the warden to deny and return it as he had said that he would. However, the attached complaint is A NEW INSTANCE of abuse. These abuses are ongoing. 11/20/2023 DATE SIGNATURE OF REQUESTER Part B- RESPONSE BP-9 Response and subsequently received on 12/7/23 as RECEIVED NOV 2 7 2023 EUREAU OF PRISONS LEGAL DEPARTMENT, SCRO WARDEN OR REGIONAL DIRECTOR If dissatisfied with this response, you may appeal to the Regional Director. Your appeal must be received in the Regional Office within 20 calendar days of the date of this response. ORIGINAL: RETURN TO INMATE CASE NUMBER: CASE NUMBER: Part C- RECEIPT Return to:

DEC NO

REJECTION NOTICE - ADMINISTRATIVE REMEDY

DATE: NOVEMBER 28, 2023

FROM: ADMINISTRATIVE REMEDY COORDINATOR

SOUTH CENTRAL REGIONAL OFFICE

TO : RANDALL ALLEN MORRIS, 15141-010

SEAGOVILLE FCI UNT: 6 GP QTR: F02-228L

2113 NORTH HWY 175 SEAGOVILLE, TX 75159

FOR THE REASONS LISTED BELOW, THIS REGIONAL APPEAL IS BEING REJECTED AND RETURNED TO YOU. YOU SHOULD INCLUDE A COPY OF THIS NOTICE WITH ANY FUTURE CORRESPONDENCE REGARDING THE REJECTION.

REMEDY ID : 1182441-R1 REGIONAL APPEAL

DATE RECEIVED : NOVEMBER 27, 2023

SUBJECT 1 : UNPROFESSIONAL, INAPPROPRIATE CONDUCT OR MISCONDUCT BY STAFF

SUBJECT 2 : INCIDENT RPT NO:

REJECT REASON 1: YOU MUST FIRST FILE A BP-9 REQUEST THROUGH THE INSTITUTION FOR THE WARDEN'S REVIEW AND RESPONSE BEFORE FILING AN APPEAL

AT THIS LEVEL.

REJECT REASON 2: YOU SUBMITTED YOUR REQUEST OR APPEAL TO THE

WRONG LEVEL. YOU SHOULD HAVE FILED AT THE INSTITUTION, REGIONAL OFFICE, OR CENTRAL

OFFICE LEVEL.

I The institution prevented the original follow.

RECEIVED

DEC 0.5 2023

tal variable ILLE

12/7/2023

Randall Morris #15141010 Federal Correctional Institution P.O. Box 9000 Seagoville, TX 75159-9000

BOP Regional Office 344 Marine Forces Dr. Grand Prairie, TX 75051

This is relevant to Remedy 7D #1182687-F1 which is currently at 8P-10 stage at Regional)

The Rejection Notice dated 11/28/2023 failed to take notice of the following facts:

- The BP-9 form was marked as "Sensitive" in 2 (two) places at the top of the form.
- 2. There were 2 (two) reasons given within Part A of the BP-9 as to why the BP-9 was being submitted as "Sensitive" to the Regional Director and was in strict compliance with the "Requirement for submission of this request directly to the Regional Director, Bureau of Prisons" instructions on the back of the BP-9 form.
- 3. The Rejection Notice did not adequately state the issues within the Sensitive complaint as multiple issues were highly detailed within that complaint.
- 4. By returning the Sensitive BP-9 to me through my Unit Team, the Regional Office has put me at risk for further retaliatory harm. Returning a clearly marked "Sensitive" BP-9 in this way also violates the provisional statement on the back of the BP-9 form that states, "The [Sensitive BP-9] form sent to the Regional Director will not be returned." That provision is meant to protect Sensitive BP-9 filers.

I am now sending the enclosed <u>Sensitive</u> BP-9 form with supporting attachments to the BOP South Central Regional Office <u>again</u> and I am including a copy of the 11/28/2023 Rejection Notice.

Respectfully,

Randall Morris

REJECTION NOTICE - ADMINISTRATIVE REMEDY

DATE: DECEMBER 14, 2023

FROM: ADMINISTRATIVE REMEDY COORDINATOR SOUTH CENTRAL REGIONAL OFFICE

TO : RANDALL ALLEN MORRIS, 15141-010

SEAGOVILLE FCI UNT: 6 GP QTR: F02-228L

2113 NORTH HWY 175

SEAGOVILLE, TX 75159

FOR THE REASONS LISTED BELOW, THIS REGIONAL APPEAL
IS BEING REJECTED AND RETURNED TO YOU. YOU SHOULD INCLUDE A COPY
OF THIS NOTICE WITH ANY FUTURE CORRESPONDENCE REGARDING THE REJECTION.

REMEDY ID : 1182441-R2 REGIONAL APPEAL

DATE RECEIVED : DECEMBER 14, 2023

SUBJECT 1 : UNPROFESSIONAL, INAPPROPRIATE CONDUCT OR MISCONDUCT BY STAFF

SUBJECT 2 : INCIDENT RPT NO:

REJECT REASON 1: THE ISSUE YOU RAISED IS NOT SENSITIVE. HOWEVER,
WE RETAINED YOUR REQUEST/APPEAL ACCORDING TO
POLICY. YOU SHOULD FILE A REQUEST OR APPEAL AT
THE APPROPRIATE LEVEL VIA REGULAR PROCEDURES.

REJECT REASON 2: YOU SUBMITTED YOUR REQUEST OR APPEAL TO THE WRONG LEVEL. YOU SHOULD HAVE FILED AT THE INSTITUTION, REGIONAL OFFICE, OR CENTRAL OFFICE LEVEL.

REJECT REASON 3: YOU MUST FIRST FILE A BP-9 REQUEST THROUGH THE INSTITUTION FOR THE WARDEN'S REVIEW AND RESPONSE BEFORE FILING AN APPEAL AT THIS LEVEL.

WARDEN'S OFFICE

DEC 2 1 2023

FCI SEAGOVILLE

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Federal Bureau of Prisons	THE GENERAL PARTIES	c rayeriisi ari	z racinerá da haras
ype or use ball-point pen. If attachments are needed, submit four copies. Or	no convinced of the completed	PD 220/13) and PD 220	(12) including any attack
ype or use ball-point pen. If attachments are needed, submit four copies. Of nents must be submitted with this appeal.	ne copy each of the completed	BP-229(13) and BP-230	(13), including any attach-
From: Morris, Randall A. LAST NAME, FIRST, MIDDLE INITIAL	#15141010 REG. NO.	F-10 UNIT	FCI-Seagoville, TX INSTITUTION
art A - REASON FOR APPEAL			
1. On 11/20/2023, I had attempted to file Team (Counselor Sandles) but was yelled office. Mr. Sandles repeatedly yelled to counseled by AW Aaron Greenfield to fill being blocked from filing @ the institute	ed and cursed at a chat he would not le a "Sensitive"	and told to g	et out of his plaint. I was then
 I promptly filed a "Sensative"BP-9 wit me through my Unit Team which violates 			
3. I filed the "Sensitive" BP-9 again wit being blocked and abused by the Unit T level but Regional rejected my filing and that I had failed to file at the i	Team for my attem again stating th	pt to file @ at my complai	the institutional
 As I have now been blocked from filing levels, I have no other administrative 			
12/26/2023		0-	~
DATE		SIGNATURE O	F REQUESTER
DATE		GENERAL	
DATE ORIGINAL: RETURN TO INMATE Part C - RECEIPT		GENERAL CASE NUMBE	R:
PRIGINAL: RETURN TO INMATE	REG. NO.	CASE NUMBE	R:

DATE

Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 131 of 213 PageID 134

BP-S148.055 INMATE REQUEST TO STAFF CDFRM

SEP 98
U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF PRISONS

TO: (Name and Title of Staff Member) Warden Grant	DATE: 2/29/2024		
FROM: Randall Morris	REGISTER NO.: 15141010		
WORK ASSIGNMENT: T Ord	UNIT: F-10		

SUBJECT: (Briefly state your question or concern and the solution you are requesting. Continue on back, if necessary. Your failure to be specific may result in no action being taken. If necessary, you will be interviewed in order to successfully respond to your request.)

On 8/31/2023, SOE Howard restricted the use of the inmate Trust Fund photocopy machine

to the duplication of "legal documents only". This restriction was further to her

arbitrary restriction dictating that the typewriters are to be used only for the

creation of legal documents. These restrictions violate P.S. 5350.27 as well as the

stated objectives of BOP Dir. Colette Peters and the 2018 First Step Act. Furthermore,

these restrictions harm not only the 1,600 inmates at FCI-Seagoville, but also the

family members of those inmates as well as all third parties that have an interest in

receiving typed and/or duplicated documents from these parties. I have enclosed an

expanded narrative of this complaint in the form of an essay that has been sent to and

has been published online by various First Amendment and prisoner's rights orgs. This

essay has also been sent to the BOP Director as well as members of the Judiciary committees.

(Do not write below this line)

DISPOSITION:

Signature Staff Member

Date

TRULINCS 15141010 - MORRIS, RANDALL ALLEN - Unit: SEA-F-A

FROM: 15141010 TO: Warden

SUBJECT: ***Request to Staff*** MORRIS, RANDALL, Reg# 15141010, SEA-F-A

DATE: 02/29/2024 08:31:51 AM

To: Warden Grant

Inmate Work Assignment: T-Ord

I am responding to your first bulletin dated 2/26/2024 which you published to introduce yourself and to express some of your expectations.

Upon receiving that bulletin, a significant number of us were initially confused as your letter of introduction began by thanking the facility for your warm welcome and then proceeded to threaten punishments for certain infractions of which many of us were unaware of. Some of us have subsequently heard about a recent and serious issue involving a cell phone and videos in building #53 which puts your bulletin in better perspective if that was, indeed, what you were referring to. With that assumption, I would like to communicate that the vast majority of us are not engaged in such community degrading behaviors.

Your bulletin went on to encourage inmates to take "college courses" and to "get a job". As I am sure that you are aware, there is a critical shortage of jobs at this facility and as I have heard that your doctorate is in Education, I hope that you might soon take a personal interest in the current barren wasteland of unused potential and lack of offerings within the FCI-Seagoville Education Center. In addition to the prolonged deprivation of academic course offerings, the education center has been closed on nights and weekends for months which further deprives us of the non-academic, non-transferrable, and token classes that were once offered as well as legal library research time and access to the photocopier for legal document duplication.

Furthermore and in violation of the Program Statement regarding Inmate Manuscripts, inmates are being arbitrarily denied access to the typewriters and Trust Fund photocopy machine for the otherwise authorized creation and duplication of non-legal literary works as well as the duplication of certain documents, i.e., copyright application forms, etc. (Please see attached essay that has recently been published through multiple online media and which has also been sent to Dir. Colette Peters and several senators and congressmen that sit on the House and Senate Judiciary Committees) The abuses within the Education Center that you have inherited are ongoing.



U.S. Department of Justice

Federal Bureau of Prisons

Federal Correctional Institution

Seagoville, Texas

Office of the Warden

February 26, 2024

MEMORANDUM FOR INMATE POPULATION SEAGOVILLE, TEXAS

FROM:

Dr. S. Grant, Warden

Federal Correctional Institution, Seagoville

SUBJECT:

Executive Introduction & Expectations

Let me start by saying thank you for the warm welcome and it is an honor and privilege to be a part of the FCI Seagoville Team. I look forward to working with each one of you in achieving your programming goals.

As your Warden, I am committed to providing a safe and orderly environment for both staff and adults in custody at FCI Seagoville. Unfortunately, there are some incarcerated offenders who continue to engage in behavior which negatively impacts everyone. These behaviors, which include drone contraband introductions, homemade intoxicants, weapons, damaging the ceilings, walls, as well as destroying equipment and property, will not be tolerated. If your unit continues to be involved in this misconduct it will result in the entire unit's loss of commissary sales, visitation, telephone, and Trulincs.

Therefore, I strongly encourage each of you to use your time at this facility in the most positive, and productive manner possible. Enroll in GED, college courses, faith-based courses, drug treatment, vocational training, and obtain a job. The entire Executive Staff will continue to conduct rounds and communicate to keep you abreast of any changes. Thank You



Dr. S. Grant, Warden

NOTICE OF ABUSES

The attached essay describes deprivations, abuses and humiliations by the FCI-Seagoville Supervisor of Education, L. Howard.

Your assitance in publishing or sharing this essay would be greatly appreciated and it might put a stop to these abuses.

The Federal Bureau of Prisons Program Statement 5350.27 regarding the production of "Inmate Manuscripts" states that its purpose is "To encourage inmates to use their leisure time for creative writing and to permit the direct mailing of all manuscripts as ordinary correspondence."

It further defines manuscripts under §551.80 as "fiction, nonfiction, poetry, music and lyrics, drawings and cartoons, and other writings similar in nature."

Under §551.81, it goes on to specify that "an inmate may prepare a manuscript for private use or for publication while in custody without staff approval."

The Black's Law Dictionary defines manuscript as "An unpublished writing; an author's typescript or written work product that is proposed for publication."

Due to the wording and encouragement of the BOP program statement, it is reasonable to conclude that authorization for an inmate to duplicate or photocopy a manuscript at the inmate's expense is strongly inferred and highly implied.

You have my permission to edit and to publish this notice and the attached essay in whole or in part. You also have my permission to use my full name and location with any publication.

Randall Morris

s 11/5/2023

FCI-Seagoville, Texas

EThis Notice and essay was recently sent to: Colette Peters, BOP South Central Regional, BOP Inspector General, DOJ Office of Internal Affairs, DOJ Civil Rights Litigation Div., US Senator Ted Cruz, US Senator John Cornyn, US Rep. Jasmine Crocket (TX-District 30), Ft. Worth Star-Telegram, Federal Legal Center, The Dallas Morning News, Human Rights Defense Center (publisher of Prison & Criminal legal News), Vanguard Incarcerated Press, Prison Policy Iniative, The Marshall Project, KERA Radio (NPR)-Dallas, Prisons Foundation, Prison Journalism Project, Texas Center for Justice & Equity, PEN America, The American Prison Writing Archive, University of Texas Prison & Jail Innovation Lab, Coalition For Prisoner's Rights Newsletter, Reason Magazine, State Vs. Us Magazine, Committee To Protect Journalists, Prison Justice League, Association of Writers & Writing Program, American Dissent, Freedom of the Press, National Writers Association, ACLU of TX]

Paying For Much More Than Our Life's Mistakes

This essay was expensive and tedious to create. Just to begin writing it required an original investment of exactly \$25.45, which is just under the \$30 per month that the Federal Bureau of Prisons is legally allowed to pay me for my prison labor under the slavery exception clause of the Thirteenth Amendment of the U.S. Constitution.

Then, each subsequent keystroke and each correction whittled away at that investment. The only alternative to this cost is to write it by hand but that would degrade the intended impact and presentation much like showing up for a job interview dressed in gardening attire would. In fact, the Supreme Court recognized the depth of presentation bias when it held that an inmate in a civil case does not have to appear before a jury dressed in jail or prison garb due to the prejudicial effect that such a presentation can evoke. (Estelle v. Williams (1976))

Unfortunately, the volume and quantity of my essays, pro se legal filings and college correspondence course work reduces this investment to \$0 surprisingly fast requiring further investments of \$25.45 ad infinitum, or at least for as long as I have a need and desire to create presentable and readable documents. And once my documents are finished, there is no way for me to save my work for future edits or to copy & paste from my documents despite the exhorbitant cost that I incur to create them.

The Swintec® 7000 User's Manual confidently states that, "Your new Electronic Typewriter increases your typing efficiency through the use of the most advanced technology." This statement was quite likely true when Sputnik was launched but it is now the fourth quarter of 2023 and if it were not for my incarceration at FCI—Seagoville, I could simply go to the local library to digitally create and save my work free of charge or, I could speak it into existence and digitally save it using Artificial Intelligence. Speaking of which, the fact that I am incarcerated is some measure of assurance that this essay is original and not created by AI.

In 2022, the FCI-Seagoville inmate commissary sold the following ribbons for the Swintec® 7000 typewriters:

Adler-Royal

Black Correctable Typewriter Ribbon Product No. 285 \$ 8.95

No Name Correction Ribbon (manufacturer & item # unknown) .90

In the fourth quarter of 2022, the retail, price of that typewriter ribbon dramatically jumped to \$15.60 and the correction ribbon jumped to \$3.90. (See attached sales receipts reflecting all of these prices and dates)

Then, in the summer of 2023 (less than one year later), the typewriter ribbon price soared again to \$21.55 but this time the ribbon seems to be coming from a different reseller according to the sticker affixed to the ribbon cellophane packaging that reads: "AROUNDTHEOFFICE.COM REORDER NUMBER SC-800-COM 1-800-816-6855." These exponential retail price hikes are particularly and suspiciously egregious considering that the FCI-Seagoville Education Center is internally paying only \$10 for the actual manufacturer's ribbon. (Swintec 7000 Ribbon Re-Order #: SWS 1009)

Meanwhile, almost one year ago FCI-Seagoville took delivery of BOP authorized word processors that would solve this problem but the current Supervisor of Education ("SOE") at FCI-Seagoville has so far failed or refused to install them despite that she had been criticized in April, 2023, by a visiting federal judge (Josh Duggar's sentencing judge) after he had expressed shock at seeing typewriters in use in her education building. All the while, the word processors have been collecting dust in a storage room while inmates struggle to afford typing ribbons.

This same SOE has recently imposed arbitrary and extreme restrictions on inmate use of the BOP typewriters and Trust Fund photocopy machine which are all kept in her Education Center building. (Inmates purchase photocopy cards from Trust Fund/Commissary at \$6.50 for 50 copies) These restrictions include an impossible schedule of only one hour per day access to the copy machine which is then rendered even more restrictive by the incessant weekly Education Center closures due to staff shortages and three recent "Going Away" parties for BOP staff. There are no make-up copy sessions scheduled to offset these closures as this SOE does not consider that pro se inmates have filing deadlines with the court and other urgent legal needs.

Furthermore, this SOE has crafted an arbitrary self-made "policy" that now dictates that the typewriters and photocopy machine are for "legal documents only" which is contradictory to BOP Program Statement 5350.27 which encourages inmates to create and duplicate manuscripts, fiction, nonfiction, poetry, music/lyrics, college correspondence course work, religious materials, etc. Worse yet, this SOE frequently changes her definition of "legal documents" when determining whether to allow use of the machines by often declaring that "the legal documents must be related to the inmate's criminal case" to type or duplicate them. To everything else, her pat response is that, "you can write it by hand."

This arbitrary and unsupported "policy" was recently tested when an inmate requested to use the copy machine to photocopy a Copyright Application Form and to make the two copies of the original literary work that is specified in the U.S. Copyright Office instructions that accompanied the copyright application. The SOE denied the inmate use of the copy machine for these copies stating that "they are not legal documents." When she was respectfully told that they are, indeed, considered to be legal documents, she replied that; "they are not related to your criminal case." She further exposed her unstable rationale by adding, "And, you are not allowed to run a business from the BOP", seemingly implying that she equates applying for a copyright with operating a business.

When asked to copy some paralegal correspondence course work before sending the originals in the mail to the school, the SOE responded that she might allow the copies to be made if the inmate can provide her with "a letter from your school showing that the school requires students to make copies before mailing course work." No school would write such a ridiculous letter as it is commonsense to make a copy before mailing anything in the mail.

This SOE recently posted a sign in the Education Center threatening disciplinary action against inmates who use the typewriters for anything other than legal docs. When an inmate was subsequently asked what he was typing on the typewriter his response was, "A Prison Release Plan, mam." To which she shrilled, "Not on my watch! Legal documents only!"

I would like to point out that FCI-Seagoville is a **low** security prison and the current cultural shift and political push for domestic prison reform is reflected in the stated goals of the 2018 First Step Act as well as the stated objectives of the new BOP Director, Colette Peters. The emphasis is heavy on rehabilitation, programming, productive activity engagement and community re-entry. And the empirical data

compiled since the signing of the First Step Act show that the rehabilitative approach is working if the lower recidivism rates since 2018 are any indication. (Sweden and Norway are wondering what took the U.S. so long to figure this out)

Against this positive backdrop, the tyrannical abuses and restrictions imposed by this SOE are akin to a self-righteous but retarded salmon swimming all alone in the wrong direction against the current of all the other fishes. And, frighteningly, she does not appear to be aware that she is alone. Furthermore, while the SOE occupies herself with arbitrary "policy" making and Gestapoesque enforcement of her restrictions while under severe staff shortages, the FCI-Seagoville Edumacation (sic) Center has not and does not offer any college classes although it has plans to offer a vocational class in 2024 for those interested in trade school. For everybody else it is a barren wasteland of unused potential and abuses.

How is it, you might be asking, that YOU have typed this essay if this tyranny is as omnipotent and prevalent as YOU say that it is? That is a fair but anticipated question. After being selected by the Associate Warden to be the editor of a new incarcerated military veterans' newsletter (The Bars & Stripes), the SOE refused to allow me to use the Education Center's typewriters to create the newsletter (I have since published seven editions) so, the local facility administration assigned me a BOP typewriter for my room against the vehement and emotional protestations from the SOE. (I am the only inmate at this facility with a typewriter but there used to be a typewriter in every housing unit until this SOE recently removed them) The SOE's stated reason for denying my use of "her" typewriters to type the newsletter in the first place was [QUOTE], "If I let you use the typewriters for that then I will have to allow everyone to use them for non-legal typing and then they will start writing the newspapers." (Referring to the outside news organizations)

Not only is her distorted reasoning an improper motive, it is nonsensical in that nothing could be more impactful to the outside newspapers than for us to be reduced to writing on napkins with crayons in order to communicate these abuses. I can only imagine how awesomely urgent the words "Please help us!" would look scrawled in bright red on a napkin. Her restrictions do not prevent this communication. They, in fact, encourage it, hence, the energy and expense I have put into this essay. Simply put, there is no penalogical or official BOP policy or other justification for these unreasonable humiliations and restrictions that are preventing inmates from timely creating and filing federal and state civil, criminal and tax court obligations and also preventing the creation and duplication of presentable non-legal literary works that are described and encouraged in BOP P.S. 5350.27 which has been in effect since 1999 and states that inmates do not have to have BOP staff approval of these non-legal creations. Furthermore, the inmates pay for these creations through photocopy cards and typewriter ribbons.

Having said all of that, I must disclose that I am privy to the SOE's sensitivity to what is written in the press about her and her Education Center because one of my op-ed pieces came to her attention when it was published online by the Vanguard Incarcerated Press (davisvanguard.org) and others in May, 2023. It was titled "BOP Offers Higher 'Degrees'" and described the lack of education offerings at FCI-Seag-oville but then went on to tout the intensity of the "Degree Program" that I was immersed into when I was put into a housing unit of 180 men with NO AIR-CONDITIONING and only five functioning showers....in Texas! To see just how intense that degree program was, simply Google the 2023 Texas summer temperature history which set records in both temps and consecutive duration.

So, yes, I have a typewriter on which I am able to create the Bars & Stripes news-letter as well as my legal and non-legal literary works.

As an absurdist humorist and non-fiction writer, I write with the idea of not only sharing my experiences, views and humor with the outside world while I am incarcerated, but also with an eye toward eventually publishing them in a collective volume. This is a BOP authorized productive activity and it is totally reasonable that I will want to produce them in a presentable form especially for the purpose of the copyright application process.

I also have several civil cases in federal court and before the US Tax Court in which I am acting pro se (representing myself) and which require timely, presentable and readable court filings. I am also engaged in a paralegal certification correspondence course which requires that I create presentable and readable lesson work and, due to caution and commonsense, that I photocopy my open book test sheets and course work before I send them through the mail to the school for credit. On this point, it is interesting that the SOE had recently informed me that she could write me a disciplinary for my having signed up for the correspondence course without first seeking her permission. That's right! For my having had the audacity to take it upon myself to pay for and import my own educational curriculum into this barren educational wasteland, this woman threatened to sully my sterling six year history of good behavior! At least she has priorities.

We could learn a lot from Norway and Sweden in how to better rehabilitate and treat the incarcerated and it is in the interest of the community that we do so as most inmates will ultimately be released back into the community. What kind of releasee would you like to move in next door to you? It is probably safe to say that you would strongly prefer someone who had not been simply warehoused for years while being arbitrarily deprived of basic growth opportunities by overlords that inhale, savor and wallow in their artificial power like high grade catnip.

There is a prolific group of incarcerated writers at this facility with some having previously had press credentials. Collectively, we, as a group of similarly concerned and affected inmates, recently began a concerted effort to obtain relief from these abuses. This effort included a writing campaign to the Office of the Inspector General, the DOJ Civil Rights Litigation Div., the BOP South Central Regional Office, BP-9 Grievances filed with the Warden's office and Tort Claims filed with the regional office claiming purchased photocopy cards that were rendered useless by the SOE's "policies" restricting the use of the copy machine that were enacted without notice.

So far, these efforts have generated nothing more than a continuous chorus of crescendoing cricket chirps. However, we fully intend to exhaust the rest of the available administrative remedies as per the PLRA so that we can petition the federal court for an injunction if all of our other efforts fail to gain relief.

It never fails to amaze and nauseate me that when the volume of Lee Greenwood is cranked to maximum, the patriotic crowds are unquestioningly moved to subjective tears and the blowing of snot bubbles as they mindlessly mumble along to the high fructose lyrics that hypnotize them into believing that they live in a land that is free from tyranny. But for many of the incarcerated, there is a contradiction that is as blatant as 4th of July festivities at Abu Ghraib. (Nothing to see here, folks. Please move along.)

Randall Morris

10/22/2023

*CI-Seagoville, Texas

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Exhibit G

Declarations / Affidavits

Under the penalty of perjury, I affirm that the following is true and correct.

- 1. 10/22/2024, I was called to building #9 and interviewed by SIS Lt. Hill and AW Rhodes in which I was told that several of my recent emails to SOE Howard asking specific questions regarding the restrictions on the typewriters and inmate Trust Fund Photo-Copy Machine have been construed as "harrassment". I responded that the emails were intended to exhaust my administrative remedies as per BOP policy and the Prison Litigation Reform Act and that "harrassment" is a miscontruation.
- 2. On 11/2/2024, I wrote an email to SOE Howard bringing attention to the issue of the Education Center closing early on several Saturdays (to include 11/2). On 11/4/2024, SOE Howard saw me pass by @ Mainline and called me over to her to inform me of the reason for the 11/2 closure. SOE Howard was quite herself and did not display any reservations in speaking directly to me.
- 3. On 11/8/2024, I sent an email addressed to the "Education Building" in which I brought a new instance of being prevented from using the Inmate Trust Fund Copier by a staff member and what this deprivation means in terms of the next available time that we can attempt to make legal copies when the holiday closures and the Thursday night closure due to another staff member "not able to work" are factored in.
- 4. On 11/11/2024, I was summoned again to building #9 and interviewed by SIS Mr. White. He stated that I am being investigated because of my 11/2 and 11/8 emails to education cited above and and because "we are hearing that you are rallying other inmates to make complaints against Ms. Howard. "He also stated that my emails seemed "angry" and he needs to make sure that I am not about to "stab" her or "something".
 - I stated that these interviews are starting to intimidate me and chill my ability to fully use the grievance process which was the intent of each email, and I mentioned my recent emails to the mailroom grieving the incessant misdeliveries of my mail and that these emails did not have me hauled before a tribunal to answer to allegations of "harrassment" of the mailroom.
 - I also mentioned that these allegations of "harrassment" present a pattern in that the SOE had accused AW Greenfield of "bullying" which caused him to be removed as her boss.
 - Lastly, I directed Mr. White's attention to the correct and non-abusive words and tone of my emails as my stellar disciplinary record and heavy engagement in programming.
- 5. On 11/11/2024, I sent SIS an email to the attention of Lt. Hill memorializing all of the above, and I forwarded an email dated 10/22 that I had sent to AW Rhodes that had memorialized the details of the 10/22 interview that I had had with SIS and AW Rhodes.
 - This 11/11 email to SIS did not appear in my Trulincs messenger inbox after I had clicked the send button which leads me to believe that messages to SIS may not appear there due to the sensitive nature and possible implications of emails sent to SIS.

Randall Morris #15141010

11/12/2024

State of Texas S.S.

I Timothy Fredrickson declare under penalty of perjury that the following is true and correct.

- 1. I was housed at the federal institution MCC Chicago in Chicago Illinois.
- 2. At MCC Chicago, the library has electronic typewriters. The ELO brand.
- 3. Prisoners are able to check out the typewriters and bring them back to the unit to type anything they wish without restriction or monitoring, in thier cell.
- 4. The typewriters are checked out for weeks at a time with no problems.
- 5. At FCI Seagoville, I would like to type a wide array of documents and communications. including letters to advocacy groups, congressmen, and attorneys, but cannot due to Howard's personal policy. I am unable to duplicate the same via copy machine as well.

Executed on December 3rd, 2024

Tim Fm

TRULINCS - Unit: SEA-F-A

FROM: Education

TO:

SUBJECT: RE:***Inmate to Staff Message***

DATE: 10/02/2024 08:27:01 AM

Unfortunately, per policy, the inmate copy machine is for legal copies only.

From: ~^! Sent: Monday, September 30, 2024 6:55 PM

Subject: ***Request to Staff***

SEA-F-A

To: Ms. Howard, Supervisor of Education Inmate Work Assignment:

Dear Ms. Howard, I have been working diligently on my autobiography for the past couple of years. I would like to know if you would allow me to copy it on the copy machine, at my expense, so that I might send it to my second reader and editor in San Antonio. Thank you for your consideration.

@inmatemessage.com>

Sincerely yours,

Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 144 of 213 PageID 147

Exhibit H

Literary Works

October 22, 2024

Dear Mr. Morris,

Hello from the American Prison Writing Archive. We are writing to you today in response to correspondence sent to us dated August 23, 2024. We hope this letter finds you well.

We were so thrilled and impressed to receive the June and July issues of the Bars & Stripes Newsletter. This is an incredible work of artistry, knowledge, and determination. Thank you so much for sharing it with us. It was so enjoyable to read a bit about the beginnings of this newsletter and enjoy the writings of contributors. Beyond that, it was a great surprise and so impressive to see the work that went into the translations of the historical documents that were found. This newsletter and the work that you and others have put into it are truly incredible. I hope you're as proud and impressed with yourselves as we were reading it.

We understand that the status of the Bars & Stripes is currently up in the air. We're sorry to hear that support of your work is not certain. We can see how valuable and important this newsletter is, not just currently, but also within a historical lineage of people coming together in confinement to share and spread news and well wishes. We will happily do our best to share your newsletter with other organizations. We believe it is worth sharing.

As for acceptance into the Archive, the APWA does not usually accept work of this kind. Newsletters fall outside of the scope of essays and poems which are our standard submissions. Because many different people contributed to the newsletter, and it contains historical documents, we may not be able to post this to our website because of privacy and permissions concerns. However, we definitely see the value in this work and want to think through how we might be able to preserve or share it. If you'd let us hold onto these issues without immediately knowing how we can share them, we'd be happy to think through next steps.

In order to consider posting to our website, we do ask that all contributors send us a permissions questionnaire form. Because these newsletters have been contributed to, whether through writing, art work, or otherwise, by multiple people, we would ask for contributors to sign and return permissions forms. If possible, we'd ask for signed PQs from Robert Williams, Erik Miltonhall, and anyone else who contributed to or helped participate in the creation of these two issues. We understand this may be difficult, but again, we do require signed consent from all contributors.

After receiving these PQs we may be able to consider posting these issues to our site with potential redactions.

Regardless of whether this might go on our website, we're so thrilled to have received and seen these pieces, and we'd like to continue spreading the word with other organizations.

Please feel free to follow up with any questions or concerns. Again, we are so impressed and excited with the work you are creating with Bars & Stripes, and we hope you are able to continue to create important newsletters moving forward.

Thank you for sharing in your talents.

Sincerely,

The Staff American Prison Writing Archive



P.O. Box 12276 Austin, Texas 78711-2276 512-463-6100 thc.texas.gov

August 13, 2024

Randall Morris, #15141010 Federal Correctional Institution P.O. Box 9000 Seagoville, TX 75159-9000

Mr. Morris,

Based on your letter of July 13, 2024, it is apparent that you did not receive my response to your letter dated July 18, 2023. Not sure what happened there. I also did not receive your letter from April of this year. In my note last year, I stated that I was aware that there had been a camp newsletter, as they were quite common across many of the camps, but that I had no specific information in my program files about the one at Seagoville. I had also enclosed a copy of the brochure the THC published on the camp at Seagoville.

I appreciate the copy of your recent newsletter and the time and effort that you have invested in translating the camp newsletter. It is great that you were able to collect so many copies of the original camp newsletter. I recently ran across some documents that one of my predecessors found on a research trip to the National Archives which you might find to be interesting material for your newsletter, enclosed.

Again, I'm not sure what happened with our earlier efforts at communication, but I hope this letter and enclosures reach you and that you find them useful.

Best wishes,

Stephen Cure

Military/Oral History Program Coordinator

Ircspunded 8/19/24



CALL FOR SUBMISSIONS

The Society for Professional Journalists, one of the nation's leading journalistic professional associations, and Prison Journalism Project, which trains incarcerated writers to become journalists and publishes their work, are now accepting submissions for the second annual Stillwater Awards.

Named after the first U.S. prison with a newspaper written and managed exclusively by incarcerated people — the Minnesota Correctional Facility-Stillwater — the Stillwater Awards are a national awards program that seeks to honor excellence in journalism by incarcerated people throughout the United States.

Submissions will be accepted from all 50 states and will be judged by a panel of professional journalists, editors and journalism educators. Entries may also be submitted by outside parties on behalf of writers. Unlike most contests, there will be no entry fee. Submissions must have been published between Jan. 1, 2024, and Dec. 31, 2024, and while the writer was incarcerated (except for the Best Collaboration category). Entries can appear in any publication including print and digital editions running inside or outside of prisons. We cannot accept unpublished works. We cannot accept more than two submissions per writer across all categories. The awards are open to all incarcerated people nationwide regardless of age or experience level. The use of AI in submissions is prohibited. If possible, emailed submissions are preferred. Winners will receive SPJ membership and its benefits.





AWARD CATEGORIES

Before you submit, be sure your submission checks all the boxes in the category.

Prison Publication of the Year

O This publication is for the community in prison O It has been in circulation for two years or more

New Prison Publication

O This publication is for the community in prison O It has been in circulation less than two years

Best Reported Essay

O This is an essay that includes reporting O It includes two or more direct quotes

Best News

O This is a story that covers an event or issue O It includes two or more direct quotes

Best Collaboration

O This is a story written by two or more incarcerated writers or between incarcerated writer(s) and writer(s) on the outside

Best Feature .

O This is a human interest or trend story
Olt could be a profile, Q&A or traditional story

Best Op-Ed

O This is a compelling and timely argument or analysis

Olt is backed up by evidence

Best Illustration

O This artwork represents a news event or issue O It could stand alone or accompany a story O It could be a cartoon or an illustrated op-ed

HOW TO SUBMIT

Submissions must be received by Feb. 28, 2025. Winners will be announced in April 2025.

Please include: Your name, DOC #, address and categories of submission.

If a web link is available, please include it along with a headline and subheadline. If you submit with a link, there is no need to include a copy of the story.

Email submissions to: Stillwater.Awards@gmail.com

Mail submissions to: **SPJ-PJP Stillwater Awards** 25 SE 2nd Ave Ste 550 #2149 Miami, FL 33131



A Publication for Veterans-In-Custody (VICs)

at FCI-Seagoville, Texas

The Seagoville Bars & Stripes Survives First Year Despite Adversity

Editor's Summary And A Surprise From Long Ago Era Revealed by Randall Morris

> Happy Birthday

> > B&S

In several aspects, this Bars & Stripes (B&S) we have created as well as recently

ago at this prison.

It was May 23rd, 2023 when a Seagoville PA system for all veterans to report to the ed next, changed how a the Veterans-In-Custody their time and, in many cases, say, for the better.

On that day, the Associate

issue is about history; that which discovered history from 81 years

> call went out over the FCIof the incarcerated military visitation hall. What happensignificant number of at this facility serve profoundly. That is to

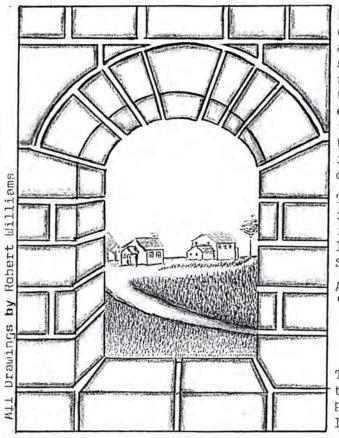
> > Warden of Programs (AW),

See SURVIVES, Page 2

Last Relic Of Its Kind Fading Away In Texas

Forgotten For Decades And Disappearing Due To Neglect, An Obscure But Historically Significant Mural Is Suddenly Noticed At FCI-Seagoville

by Robert Williams and Randall Morris



Approx. Size: 5ft W x 8ft L (Erosion Mot Depicted)

Hundreds of federal inmates and staff walk past it every day but are oblivious to its presence, genesis and dire physical condition even though it is in plain sight. And, after its existence and location were recently pointed out to a randomly selected sample of these daily pedestrians, their reactions to this sudden awareness were pretty much all the same: "Oh, wow, that's so cool", "I had no idea that this was here all this time", "I wonder how old it is and who created it" and "This needs to be restored before it totally disappears."

The object of this surprise, fascination and concern is a weathered and fading World War II era mural that is exposed to the outside elements in a basement-level light well at the front of building #9 within FCI-Seagoville. (See map on page 3)

According to the Texas Historical Commission's website, "Next to historic Ellis Island in New York, the most architecturally significant Immigration and Naturalization Service (INS) confinement site was arguably Seagoville."

This significance began on April 1, 1942, when the INS took control of Seagoville from the federal Bureau of Prisons (BOP) to house "alien enemies", who were mainly legal US resident aliens and naturalized US citizens

See RELIC, Page 3

Aaron Greenfield, who will retire soon, announced that he would create a unique veterans-only housing unit with an exclusive courtyard as well as amenities which would include veteran identification lanyards.

On a whim, the AW arbitrarily asked me to create a veterans' newsletter and to serve as its editor-in-chief despite my lack of journalistic credentials and despite that, according to the AW, the federal Bureau of Prisons (BOP) generally frowns upon and discourages inmate produced newsletters. In fact, a June 15, 2023 study by the Prison Policy Initiative titled "Breaking news from the inside: How prisons suppress prison journalism", reported that the BOP has an "explicit ban on journalism". However, after a thorough search, we were unable to find any BOP policies banning inmate newsletters but the fact that the B&S is the only one that is known to exist within the BOP supports the possibility that they may, indeed, be discouraged.

The first issue of the B&S was published on June 6, 2023 and there have been 14 subsequent issues published since then which includes this ambitious issue. But even though the B&S publication has grown in size, content, quality and contributors, it is continuously plaqued with difficulties in obtaining photocopies from staff for the distribution of it to the VICs, and with the AW set to retire soon, the question as to the future of our newsletter is becoming paramount.

Adding to these difficulties are the conditions under which we produce these monthly newsletters. The Swintec® 7000 User's Manual confidently asserts that, "Your new Electronic Typewriter increases your typing efficiency through the use of the most advanced technology." This might have been true when Sputnik was launched, but using a rickety, ribbon consuming typewriter, which has no text storage or spell check ability, in 2024 is neither advanced or efficient. (Shout out to Benjamin Franklin and his printing press) It is also expensive as we must purchase our own typing and correction ribbons at the current combined price of \$25.45 at commissary.

Looking forward, we hope that the BOP will see some productive activity and outside media value in our newsletter to the extent

that it might be more aggressively supported by the BCP as many of the state prisons are doing with state prison newsletters.

The B&S recently discovered that in the long history of the prison at Seagoville, there had, in fact, existed one other newsletter that had become buried in the dust of time and further obscured by a language barrier. During World War II, the US Immigration and Naturalization Service (INS) took control of Seagoville from the BOP for the purpose of housing "enemy aliens", who were predominately legal US residents and naturalized US citizens of Japanese, German and Italian origin. (See accompanying article, Last Relic, for full history) The German internees left a written record of their time at Seagoville through a weekly newsletter they produced and, of which, the B&S was able to locate and print with the help of several staff and especially Counselor Sandles. These newsletters were, naturally, written in German and, by strange coincidence, this editor just happens to speak German and has begun the time consuming process of translating them into English.

So, to commemorate the one year mark of the struggling Seagoville Bars & Stripes newsletter, we felt that it would be very contrasting and impactful to reach back 81 years to the first edition of the only other newsletter to have been produced at Seagoville and bring back to life the voices and experiences of a detained population who had lived and worked in and around these very same buildings that, at that time, were quite new. But for this editor, it is the omnipresent typewriter that won't go away and which binds us through vast time and space.

The B&S is happy and fortunate to report that we now have a total of 13 of the German news-letters spanning from September 1, 1943 to August 19, 1944. Besides the fact that they are all written in German, each one also includes crude but original hand drawn art. The recently translated first issue of the German newsletter from September 1st, 1943 along with the original are attached.

Come Write With Us!

The Bars & Stripes needs a few more voices. All writing levels are welcome. Choose to be a regular or occasional contributor.

Interested writers are encouraged to attend the B&S committee meeting held each Wednesday at 1:50 pm in bldg. #10 dayroom (upstairs) or see VICs Robert Williams or Randall Morris.

who had originated from the Axis Nations of Japan, Germany and Italy. The INS was given the task for this housing through the Dept. of Justice's Alien Enemy Control Unit Program, which had been created during a period of security hysteria after the bombing of Pearl Harbor.

Once the INS had assumed control of Seagoville from the BOP, it rebranded it as the Seagoville Enemy Alien Detention Station in order to technically comply with the 1929 Geneva Convention's prohibition on using prisons to detain "enemy alien" civilians in prisons, which is what Seagoville had been since it was built in 1941 by the BOP, according to the Texas Historical Commiss-

ion (THC). [Editor's note: Some current BOP staff dispute that Seagoville was built in 1941 with most citing 1938 as the correct year.]

Under the INS, this facility included a hospital, auditorium, service buildings and 352 rooms for the Japanese, German and Italians who were housed here until its closure in May 1945, at which time the facility reverted back to operating as a prison under the BOP.

The THC's website further states that, "One of [Seagoville's] lasting features is a large mural painted by internees in the internment camp's hospital. According to interviews with former Seagoville Federal Correction Staff, internees painted a landscape mural on a concrete retaining wall (light well), outside the building's basement floor dining area." It went on to speculate that the mural may have been created as a visual escape to what would have otherwise been a view of a plain concrete wall through the basement window while they ate:

In 2006, the THC concurred that Seagoville is eligible for listing in the National Register of Historic Places because of its lasting legacy in the historical record, the internee mural, oral history interviews, historic photographs and through the site's architectural significance.

Then, between 2007 and 2012, THC reviewed all eight of the confinement sites that housed "enemy aliens" in Texas and concluded that the mural at Seagoville is the

only one still in existence in the state.

The B&S's own Robert Williams, who has been incarcerated here since 2014, only recently discovered the mural in mid-May. "I happened to glance over the wrought-iron railing and looked down where I noticed a faded mural that I had never noticed before," he reported. "I was shocked and felt a surge of emotion as if this beautiful rendering had some kind of message or meaning to convey."

With his interest piqued, Williams approached Dr. Poulson in building #9 to find out if he was aware of the mural and, to his surprise, found that Dr. Poulson is one of a very few current staff that is aware of the mural. Dr. Poulson also graciously provided some of the

research material from which this article was written. Regarding the current dire condition of the mural, Dr. Poulson opined, "The hard part in dealing with historical items, such as these murals, is how to perform maintenance and keep it from deteriorating...someday... the Historical Commission will have to decide how to preserve it..."

GRASS LA

Chaplain Schanfish, who also knew about the mural's existence, added, "The mural...is a portrait of the 'Warden's house' and the 'Associate Warden's house' as the detainees saw them peering out of the compound. The loss of this historical artwork would constitute a loss of the significant visable history of this institution during WWII. Such a loss would be tragic. I would greatly appreciate any efforts to preserve such a rich part of FCI Seagoville's history and memorialize those families who were detained here."

The FCI-Seagoville Bars & Stripes is committed to ethical, objective, responsible, fair and inclusive journalism for the purpose of restoring honor and dignity to the incarcerated veteran community at large.

Robert Williams

Chairman -B&S Committee and Art Manager

Erik Miltonhall, Co-Chair -B&S Committee

Randall Morris, Editor-in-Chief & Layout



VICs Building #10 Courtyard Dedication Ceremony

After a short VICs Assembly meeting on 9 July, the VICs moved to the courtyard of building #10 for a ceremony conducted by AW Greenfield to dedicate the VICs courtyard in the name of VIC Lynn D. Rayl, who passed away on January 1, 2024 after having been one of the first VICs to move into the VICs housing unit in June 2023.

A new plaque in the courtyard reads:

Dedicated
in
Memory
of
Lynn D. Rayl
(USAF '65 - '73)
1944 - 2024

The courtyard is now known as the Raylyard.

VICs Housing Unit (Bldg. #10) Rooms Still Available

Open rooms are still available to choose from. See Counselor Sandles in Bldg. #6 to request move in.

Current Benefits: 2-man rooms with doors; quiet and cleaner living environment; no smoking or drug use; multi-purpose dayroom with tables, books & plants; closer to medical, chow hall & recreation; user controllable shower temp and run-time; board games for check-out; courtyard

Planned Benefits: Washers/Dryers & Microwaves; Air-conditioning coming (contractors recently took measurements)

Come Write With Us!

The Bars & Stripes needs a few more voices. All writing levels welcome. Choose to be a regular or occasional contributor. Either way, this newsletter is your way to get published.

Interested writers are encouraged to attend the B&S committee meeting held each Wednesday @ 1:50 pm in building #10's upstairs dayroom or see VIC Robert Williams or VIC Randall Morris. We are now considering to add a few non-veteran writers.

VICs Education Committee Maintains List Of Free Books To Prisoners Orgs

A representative of the Education Committee has suggested that the B&S publish some of the organizations that provide free books to prisoners and we think that that is a great idea and we have provided a few below. We will print more of them in the next newsletters or see an Education Committee member for the full list they maintain. Also, as most of these orgs cannot provide specific titles, it is important that you only request books of particular genres, e.g., history, fiction, etc.

Inside Books Project 12th Street Books P.O. Box 30129 Austin, TX 78703

Prison Book Program

c/o Lucy Parsons Bookstore

1306 Hancock St

Suite 100

Quincy, MA 02169

(also ask for the prisoner resource dir)

Seattle Books To Prisoners c/o Left Bank Books 92 Pike St. / Box A Seattle, WA 98101

Free Certificate Based Correspondence Courses

As this one year anniversary issue of the B&S has been given authorization for a much larger distribution, we are including the information for the free correspondence courses that we published in April.

College Guild - P.O. Box 696, Brunswick, ME 04011 - Offers free courses in Science, Math, History, Art, Creative Writing, Culture and Society.

Prison Journalism Project - 2093 Philadelphia Pike #1054, Claymont, DE 19703 - Offers a free journalism course - "A Prison Writer's Guide to Media Writing".

New: Sound Off! (Letters To The Editor)
Letters to the editor of up to 250 words will
now be considered for publication. Due to
space limitations, one letter will be selected to publish with each issue. Submit in sealed envelope addressed to B&S in building #10.



_Seagoville , Texas den 1. September 1943 Vol. I No. 1

Unser Motto ist : " GENEINEUTZ VOR EIGENNUTZ ", ist es auch Dein's '

Mit der vorliegenden ersten Ausge- : ZUM GELEIT: be des "Saegedorfer Kaeseblattes" Unser Kaeseblatt macht hiermit sei ist der langgehegte Wunsch einer ne formelle Verbeugung, und zum Lager-Zeitung fuer die Bewohner des Zeichen, dass wir uns gar nicht a Dorfes Seagoville zur Wirklichkeit ernst nehmen, nenen wir es eben geworden. Zwar etwas klein und dünn ein "Kaeseblatt", da uns im Auger ist unser"Kriegskindle"ausgefallen, blick nichts besseres einfiel . aber das konnte nicht verhindert werden, da das Unternehmen sich gleich von der ersten Ausgabe an selbstaendig "ernaehren" muss. Sie | fender Name einfallen wird , und alle koennen dem kleinen Kerlchen | somit verkuenden wir hiermit eine em besten dadurch auf die Beine verhelfen, indem Sie Ihr Monets - der unserem Geisteskind einen zue: Abonnement sofort Ihrem Hausbericht tigen und dauernden Mamen geben sc erstatter uebergeben. Wir hoffen schon mit den naechsten Mummern , die von nun an jeden Sonnabend er- der Kantine aufgestellten Kasten 2 scheinen sollen-,4 seitig heraus zu kommen.

Aufgabe gestellt fuer die gesamte Bewohnerschaft des Dorfes ein Organ Gewinner weberreicht werden soller zu schaffen, das - unabhaenrig von sobeld das erste Bier hier eintri-irgend welcher Seite - den deutscheh Internierten ein treuer Freund und | Abonnement : Der Bezugspreis Berater sein soll. Wie der vorlaeu+ fuer den " Saegedorfer Hinkenden fig gewaehlte Mame schon andeuted, Eoten " - oder wie immer unser Fi wollen wir von der grossen Weltpolitik in diesen Spalten absehen , denn selbst dem geschulten Zeitungs Monat, und wir bitten herzlichst menn ist es nicht moeglich hinter Stacheldraht den wahren Verlauf der Summe auswerfen zu wollen, Sena politischen Geschehnisse zu verfol; schliesslich ist unsere und a ch gen.

gung , dass wir mit kleinen Unter- halber und unbezahlt, aber die haltungsgeschichten und lustigen Begebenheiten im Dorf selbst dazu beitragen koennen den Geist der Kameradschaft zu erhalten und zu wir Dich hinnaus "Kaeseblaettchen" Tahn oder E Tah | foerdern. Mit diesem Wunsch senden und hoffen , dass Du Freude und neuen Mut in jedes Heim bringst!

Jem Redaktionsstab gehoeren an :

2.	A.E.der	Gestrenge Lustige	Schrift -
3,	A.E.der	Kritische) . Leiter .

Berichterstatter :				
Herr Herman Koetter	fuer	Haus	4	
" Emil Bayer	11	:1	5	
" Dr.Otto Thuss	11	11	6	
Die Schriftleiter	11	11	7	
Die " Gute Laune "	11	3.5	10	
Horr Dr. Mans Weseman	nn"	11	11	

GLŰCK AUF!

Tedoch plauben wir bestimmt, das Ihnen trotz der hier bestehenden Duerre("iermangel) oin viel trefsomit verkuenden wir hiermit eine

der unserem Geisteskind einen zue: Bitte alle Einsendungen bis Dienswerfen . Als Preis fuer den erwaei ten Namen setzen wir hiermit 6 Ple Die Schriftleitung hat sich die schen Bier aus, die promte mit fei erlicher Zeremonie dem glueckliche

> in Zukunft heissen wird - betrace sage und schreibe 5 ganze cents pi alle restlos dafuer diese ungelieut Ihre willkommene Mitarbeit ehren Druckkosten usw. muessen bezahlt werden , kurz , das neue Unternehmen muss sich selbsttragend macher Die Korrespondenten der einzelnen Maeuser werden Ihr Abonnement rem Jahr oder 5 Jahre im Voraus bazah. fund im letzteren Falle gamentieren wir sogar freie Hauslicferung fuci noch weitere 5 dahre.

Kleine Anzeigen und Annoncen : werden von Gerra Zimmermann Leus : Dimmer 28 jederzeit entgegengenommen, falls Sie also ein Zimmer für Tage , Standen oder schwache Stuaden su vermieten haten , oder som etwas der Dorfremeinde anzubisten haten, hemiten Sie ruhig diese Cherrliche Gelegenheit und ausgest Bren Sie. Prois pro Spalten-Coll 1: 110 cents. 27

" G'surd san mer !

Mallo, liebe Seitung von Seagoville , Alle Achtung , sei herzlichst willkommen! Unsern innigsten Glueckwunsch! Mit Freudengebruell S ei gegruesst von den Heiden und Frommen! Z weifellos leuchtest Jeden in's Merz und Gemuet , E's waer' ohne Dich gar zu dunkel -H eil Deines hohen Geistes Gebluet. . N ie erloesche Deiner "Sterne" Gefunkel! die "rosige Laune."

Ein Dichenkranz fuer :

unter diesem Titel werden wir hin und wieder Litalieder unserer Gemeinschaft loberd hervorheben , die unserem treudeutschen Motto : "Gemeinnutz vor Eigennutz" in hervorragender Weise gerecht werden. Bisher haben wir Gott sei Dank schon des Defteren Gelegenheit gehabt, derartige aus dem Rahmen des absolut Notwendiren fallende Handlungen oder Tacan zum Besten der Allgemeinheit au beobachten, und sollen diese Praeger echt deutschen Gemeinschaft die Fenz jumpen werden , denn sch Gefuehles auch die gebuehrende Anrkennung erhalten.

Muss Das Sein ???

Matuerlich MUSS das nicht sein , denn die Ant- Wir geben Ihnen aber feir Warning wort in dieser Rubrik wird immer mit einem kracftigen NEIN zu beant klatsch zu hueten , denn wir koenworten sein. Wir erbitten besonders nen einfach keine Zikrets kiepen, fuer diese Rubrik die Mitarbeit des und liegen stets auf der Lauer die ganzen Dorfes. Einsendungen hierfuer neusten Humers zu ketschen. Also oder irgendwelche Mitteilungen die bis naechstes Wiekend remeinen wir Torfzeitung betreffend, koennen in Thre . . . Eduardehen & Miniken. den in der Kentine aufgestellten verachlossenen Fasten geworfen werdin, und werden unsere gebuehrende Adherksamkeit finden.

Wir fragen also gleich : MISS DAS SEIN , dass wir ein Kaeseblatt geschaefte liegt in den Faenden hier herrausbringen ? Und wir er-lauben uns hiermit das einzige Mall ses. Dr. Wesemann, Vorsitzender . cri einem lauten "JA" zu antworteh Dr. Blass Referent fuer Vortrange demm wir moechten gern mit einem fracen Lachen und mit viel Spass fells Woche bei Thnen einkehren.

chliesslich koonnen Sie das Fire Papier unseres Kaeseblattes zm Einwickeln Threr Picknickstulten oder sonst ganz nach Belieben erwenden. Ausserdem wird Ihnen der gegeben wurde, umfasst u.e.mcdumstille Wiederkauungsgemies dieser watberen Plactter in spacteren dahren vielleicht mal ein frohes

Zitate: Grosse Zeit Lat (s inmer nur, wenn es beinahe schief geht, wenn man jeden Augenblick fuerchten muss : sich's. Courage ist gut, aber Aus- teressauten om fentlichen Vortrag deuer ist besser. Ausdauer, das ist gen ist rleichfall in Aussicht zo die Eauptrache. Theodor Fontane

Die meeskate Mummer wird am Sonnshend den 11. September erscheinen, nicht einrosten.

Eduardchen & Minniken spinnen :

The second of th

Nicht nur dem neuen Kaeseblatt , sondern auch den Lieben Lesern wollen wir umsere herzlichsten Glueckwuensche aussprechen, aber nicht etwa deswegen , dess nun ei neue Zeitung appiert, nein davon gibt's ja schon ein Lot, aber welche besitzt denn ein Eduardche % Mirniken 7 Ah , der you ar , naemlich ger keine. Ob Sie uns nu leiken oder nicht , Angst braucher Sie keine zu haben , dass wir ueb genug, wir werden zu Ihnen sticker und mit unserer Kolum soviel Atte: schen attracken , dass ohne die Spinnerei das Kaeseblatt einfach nicht richtig schmellen wuerde. sich in Fjuter vor jedwedem Dorf-

Programm der deutschen Volkshoch beginnt die Volkshochschule inre Taetigkeit. Die Leitung der Schul , und Frau Heitmann , Sekretaerin. Herr Wirz als Sprecher des Lagar. | eusschusses , und Miss Jones & 3 Vertreterin der amerikanischen j' Lagerbehoerden sind Belsitzer des Schulausschusses.

Das Schulprogarmm , das durch Anschlag in den Haeusern bekarnt Sprachen: Spanisch, Franzoesisel. Italienisch und Russisch , Techer sches Zeichnen und Stenographie. Erinnerungslachen hervorzaubern , : Eine Klasse fuer Malen und Zeiche und dann ist ja unser Eweck erfuellt. sowie eine Husikklasse fuer Klas und Harmonielehre dienen der kusn leriacher Aushildung. Eine besond re Klasse furr prektische kunstge werbliche Cartizkeit bietet eine gruendliche ber Wliche Weiterbil. nommen. - Pald wird es ja kuehler iund die Langen Winterabende komme. Mehmt diese Gelegenheit war, arbo tet alle mit, und lasst Euren Gei

Seagoville Cheese Gazette

Vol. 1 No. 1

Seagoville, Texas the 1st of September, 1943

Our Motto is: " Community Interest Before Self-Interest ", is it also your's?

With this first issue of the Seagoville Cheese Gazette, a long held dream for a camp newspaper for the inhabitants of Seagoville has become a reality. Indeed, our unusual "War Child" is thin and small but this could not be helped, and this undertaking must support itself from the first edition onward.

All of you can help to get it on its feet by immediately delivering your monthly subscription payments to your building correspondant. We hope to increase the publication to four pages every Saturday beginning with the next issue.

The writing staff has taken on the task of being a voice for the whole community that - free of partisanship - the German internees should regard as a true friend and advisor. And, as our newspaper name suggests, we don't want to get into the big world of politics in this column because, even for our well-educated journalists, it is not possible to keep up with or to follow events from behind the barbed wire.

However, it is our conviction that the spirit of camaraderie can be kept and promoted by the telling of our stories and funny occurrences in the camp. So, with these wishes, we are sending out the Cheese Gazettes to you and hope that they bring joy and new encouragement into every home!

Editorial Staff:

1.	A.E.	the	Stern) Editorial
2.	A.E.	the	Funny	
3.	A.E.	the	Critical) Manager

Reporters:

Heb	orters.	
Mr.	Herman Koetter for building	4
Mr.	Emil Bayer for building	5
Dr.	Otto Thus for building	6
The	Editorial Mgr. (A.E.) for bldg.	7
The	"Good Mood" for building	10
Dr.	flans Wesemann for building	11

Luck To All!

Here's Our Problem:

Our Cheese Gazette takes its formal bow, and to show that we don't take ourselves too seriously, we named it "Cheese Gazette" because, frankly, we couldn't think of anything better.

However, we certainly believe that despite the existing drought here (beer deprivation), you are capable of coming up with a suitable name so, consequently, we announce, herewith, a

Competition

to give our "intellectual brainchild" a more proper and lasting name, so please drop your suggestions into the box that has been set up in the canteen by 7 September. The prize for the winning name will be six bottles of beer, that will be set aside and promptly given to the lucky winner with solemn ceremony whenever we receive the first delivery of beer.

Subscriptions;

The subscription price for the "Seagoville Limping Messenger" - or, whatever our child will be called in the future - will literally be 5 whole cents per month and we sincerely ask that all of you will want to cough up the complete amount of this monstrous sum because, although we appreciate and welcome volunteers, the printing costs, etc., still must be paid so this enterprise must make itself self-sufficient.

The newspaper reporters in the individual buildings will gladly collect your subscription payments. You can also pre-pay one to five years in advance and in the latter case, we will even guaranty free home delivery for an additional 5 years.

Classified Ads & Announcements:

Get with Mr. Zimmermann in building #7, Room 28, at anytime if you have a room for rent by the day or hour or if you have anything else to offer the camp community. Simply use this splendid opportunity and announce it. Price per 1/2 inch is 10 cents.

[Translated by Randall Morris, editor of the Bars & Stripes inmate newsletter of FCI-Seagoville, Texas - 7/5/2024]

Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 155 of 213 PageID 158

Haus Zehn in Hello, dear newspaper from Seagoville,

H ---> Haus Zehn in
A the original
U means "BuildS ing Ten"

Z

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H

N

A ttention everyone, it is heartily welcomed!

O ur deepest wishes! With roaring joy,

Y ou are greeted from the meadows and the devout!

N o doubt, everyone's hearts and minds are now illuminated,

I t was way too dark without you -

H ail, to your high intellectual blood

A nd, may your "Star's" sparkle never be extinguished, or lose the "rosy mood".

An Oak (acorn) Wreath for:

Under this title, we will from time to time spotlight members of our community with praise who exemplify and do justice to our true German motto: "Community Interest Before Self-Interest". Up to now, thank god, we have already and often had the opportunity to observe such actions that benefit the general public and, therefore, such ambassadors of the true German sense of community should receive the proper recognition.

Must This Be ? ? ?

Naturally, it MUST not be, so the answer to this column will always be a forceful, NO. We ask for special cooperation and input from the whole camp for this column. Submissions for this or anything else that the camp newspaper might be interested in can be dropped into the locked box that has been placed inside the canteen and it will receive our full attention. We also ask the following question: MUST THIS BE, that we will now publish the Cheese Gazette? And we will allow ourselves this one time to answer it with a resounding "YES" because we really want to enter your home with a lot of fun and laughter each week.

Finally, you can use the good paper of our Cheese Gazette to wrap your picnic sand-wiches or any other uses to your liking. Besides this, these valuable pages might magically produce rumination pleasure and a few memory laughs for you in later years, and when this happens, our purpose will have been fulfilled.

Quotat ion

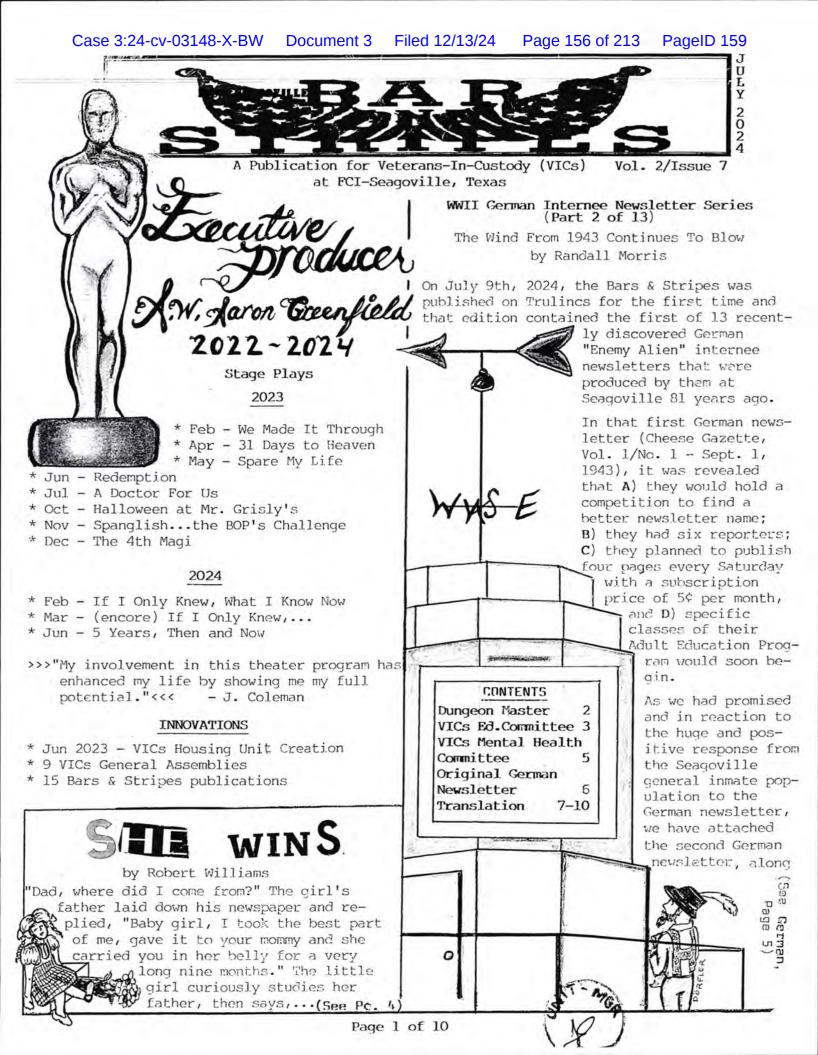
Good time is only when it almost goes wrong and you feared every moment. Now its over. Then it shows. Courage is good, but perseverance is better. Perseverance, that is the main thing. -Theodor Fontane

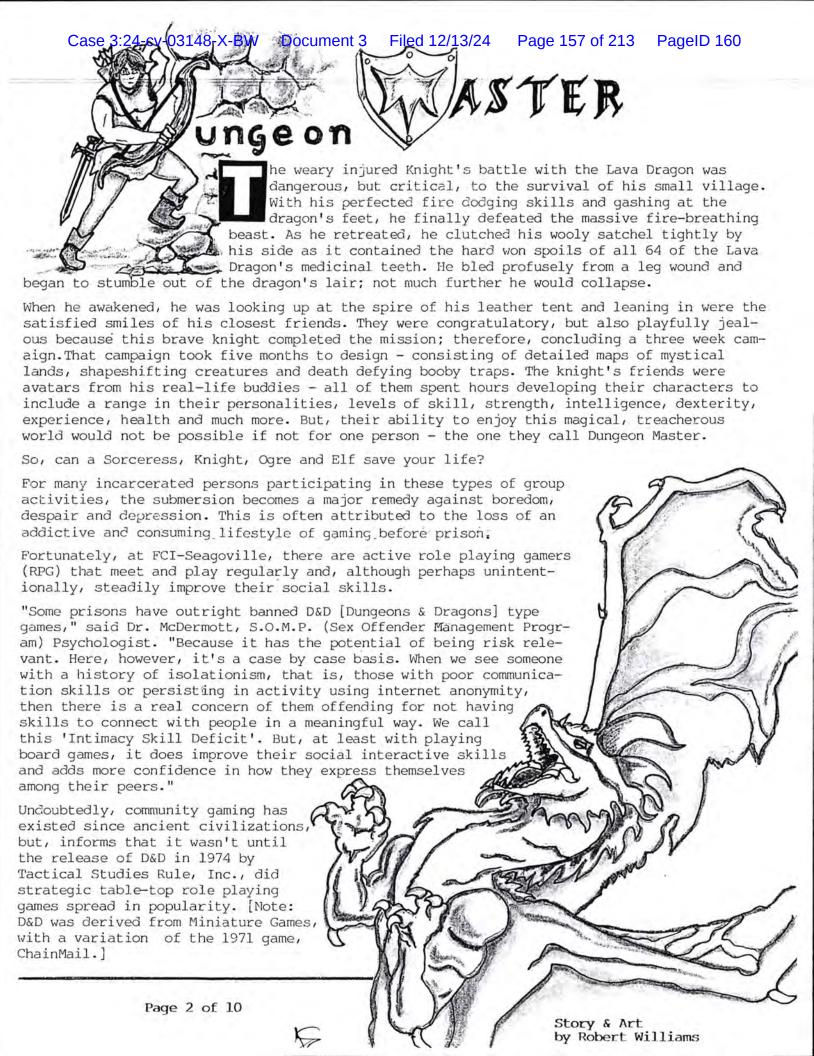
The next issue will be published on Saturday the 11th of September. [1943]

Eduardchen & Minniken Talk Nonsense: We want to express cordial good wishes to not only the new Cheese Gazette, but also to the dear readers. This isn't because a new newspaper has "appiert". No, of these there are plenty. It's because, we ask, which of them has an Eduardchen & Minniken? Ah, "der you r", that is to say, none. Whether you like us or not, have no fear that we will "ueber die fenz jumpen", then already enough, we will "sticken" to you and our "kollum" will so much "attensichen attracken" that it would not correctly "schmellen" without the nonsense of the Cheese Gazette. We give you fair warning to protect yourself in "fjuter" from any village gossip because we simply can't "zikrets kiepen", and are constantly lying in wait for the newest "rumers" to "ketschen". Well then, until next "wiekend" we "remainen" yours,... Eduardchen & Minniken

German Adult Education Program At Seagoville:
The Adult Education School begins activities
on 1 September. The administration of the
school lies in the hands of a three member
committee. Dr. Wesemann, Chairman; Dr. Blass,
Advisor on Performance and Ms. Heitmann,
Secretary. Serving as auxiliary members of
the committee are, Mr. Wirz, Spokesman for the
Internee Camp Committee, and Miss Jones, a
representative of the American Camp Administration.

The school program, which has been posted in all buildings, includes Technical Drafting and Stenographie as well as the following languages: Spanish, French, Italian and Russian. A class for painting and drawing as well as a music class for piano and singing rounds out the arts training. A special class for practical commercial art offers a thorough doctrine of occupational studies. A series of interesting public lectures is also on the horizon. —Soon, the cooler and longer winter evenings will come. Take this opportunity, everybody participate and don't let your spirits rust.





Case 3:24-cv-03148-X-BW Document 3 Filed 12/13/24 Page 158 of 213 PageID 161

Today, the RPG genre includes table top, collectable card games and digital games/apps. And as of 2022, this industry is valued at more than \$44 billion worldwide, with an annual growth rate of 8%, according to Statista.com. That growing popularity has clearly extended to prisons.

"Before coming to prison, I'd played some RPGs," said VIC Kurt Jensen. "But after meeting a G.M.(Game Master), who offered me and a few of my friends to play his campaign, I became involved in the RPG gaming community."

The D&D RPG as well as others, such as Pathfinder, are known as D20 systems: games played with 20-sided dice. Moreover, there are several dice, usually homemade, created with craft paper, glue, paint and floor wax. "Every action requires a roll," said VIC Chris Lenos. "The roll is to determine how strong or effective the given action will be. Basically, you use the various dice to beat whatever number your opponent or G.M. has set upon a character stat,

defensive move or some value

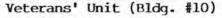
Game sessions can take many hours don't always have to fight," said there are dozens of popular D20 ate a business, go into politics, creative G.M. might imagine as a ed that, "The G.M. is very busy (Non-Player Characters), such as people, etc. He's the glue to game progressing."

Although many prison players are ing sessions, they tend to be about their get-togethers be-Sandvig, "Gamers are often teas-

^Ned and looked down upon as social outcasts. But, Vin Diesel is a huge gamer, and I'd bet that nobody teases him."

"I just wanted to try something new because I got really bored with tablet games which made me feel that I was becoming antisocial," said VIC Oscar Weeks before concluding that, "This [RPGs] gives me a chance to think about something other than prison."

"Your mind is your own world," said VIC Lenos, "and in that world, the only things that existare what you put there."



---> Dayroom A/C Now Functional!!!

Open rooms still available. See Counselor Sandles in Bldg. #6 to request move in.

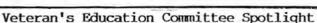
Current Benefits: 2-man rooms w/doors; quiet/cleaner living environment; no smoking or drug use; courtyard garden; multipurpose dayroom w/tables, books & plants; closer to medical, chow hall & recreation; controllable shower temp and run-time; board games for check-out

Planned Benefits: Washers & Dryers; Contractors recently measured for central air.

Come Write With Us!

We need a few more voices. Regular or parttime writers - All skill levels welcome!!!

See Rob Williams or Randall Morris or come to the 6&S committee meetings held each Wednesday 0 1:50 pm in bldg. #10 dayroom.



non-veteran, Rose Ruiz. "Today, systems that allow you to oper-

as he controls all the NPC's

Nrather cautious and discreet

Nicause, according to VIC Kurt

The Education Committee wants to recognize VIC Mark Boston for his iniative and tenacity in gaining approval for the Henry George Academy's Political Economy & Social Philosophy classes that will be offered soon (TBA). VIC Boston will also be the class instructor.

Below is another "Free Books to Prisoners" address from the education committee.

> Books Through Bars NYC c/o Bluestocking Bookstore 116 Suffolk St. New York, NY 10002

What Do You Think?

Have we struck a chord or a nerve with something we've published? Do you have a personal connection or a different perspective on a recent article? If so, we'd love to hear about it and also publish it. See Robert Williams.





celt was a very long

and uncomfortable

said it."

"Is that why you look like me?" He chuckled, "That's right, we have so much in common; same nose, same chin, same eyes, and someday,... (he carefully looks around, leans over to her ear and whispers), we will even dress the same."

The little girl excitedly ran over to the closet, grabbed a curly red wig, returned, and with some effort, squared it onto her father's head. She then stood, smiled and said, "Daddy, you look pretty." To which, her father teared up , smiled and replied, "Thank you, sweetie. No one has ever said anything that nice to me."

Mr. Smith "was" a U.S. Army Veteran, a doting father of three, a dutiful husband and a closet transgender. It was a secret lifelong battle that would strain his marriage resulting in a live-in separation. But, Mr. Smith needed to transition and did so only three months before catching a federal criminal case. "Jenny" Smith would finally make her necessary introduction to her family only three months before her abrupt arrest.

It was July 4, 2016 and, although all of Jenny's family were gathered together, she was standing in her driveway having to explain to her eldest daughter why every Thurs-

day night her father would frequent popular downtown Dallas bars.

"She wanted to know if I was cheating on her mom." Jenny responded with an emphatic denial, but understood her daughter's suspicion, "I told my daughter that after the barbeque I was planning to go to the Cedar Springs district." There was a long pause before she sarcastically responded, 'Yeah, uhhmm - Dad, those are gay bars.' It was a very long and uncomfortable stare, then,... I just simply said it. Sweetie, I'm a transgender. Then, surprisingly, she just laughed and said, 'Yeah, well, we already knew but I wanted to finally hear it from you.' She went back to the party , and I immediately jumped into my truck and got drunk at the bar. When I got home, my wife

said, 'No, No, No! - You're sleeping over there!',... and, we've been separated ever since."

Now that Jenny was "Out", she felt liberated and immediately sought the comfort of dresses, cosmetics, female undergarments and hormonal supplements to help transform her body. "I was so eager that I began making the stupid mistake of taking very high doses of black market estrogen and testosterone blockers which produced a life threatening side effect." Jenny ended up hospitalized and, after seeing a VA doctor, was referred to a psychologist who diagnosed her with the rare condition of Gender Dysphoria, a strong and persistent cross-gender identification. It is manifested by a desire to be the opposite sex because of an inherent discomfort with one's biologically assigned sex, which, for Jenny, had begun in adolescence.

Indeed, Jenny's earliest childhood memories are of her playing dress-up with her sisters and other neighborhood children; much to her mother's frustration of continually finding Jenny in girls clothing.

> "I was always lonely, soft spoken, and effeminate. This was the '70's & '80's. Back then, nobody understood queerness and kids would beat you up just for being different. I always stood out. By the 6th grade, the girls would always tell me that I spoke a lot with my hands and sometimes called

didn't mind because they accepted me in their circle. But, by age 13, I told myself that my gender really was a mistake and I was convinced that I really was a girl with boy parts. So, I began wearing panties under my boy underwear and would take birdbaths at P.E. to avoid being in front of the boys. I did this all the way up to my senior year."

Shortly before graduating High School, Jenny began speaking to an Army recruiter. "They make a lot of promises and, because I really wanted to become a good parent someday, I thought that the Army would provide me with a solution to my identity dilemma. However, after I had joined and while stationed in Bad Kissingen, Germany, I was harassed, threatened, insulted and sexually assaulted. I know that I did not ask for that but, I've become

stare, ... then, I just simply me a sissy, but I really

(See She Wins, Page 5)

compliant and passive in my acceptance of other's needs over mine. Such was the case with my wife, whom I first met after I had left the military. Initially, we were just friends, but she became very aggressive about her needs and I have a habit of just being compliant."

For many years, Jenny privately languished between the marriage, parenthood, and identity disorder. However, for three months after "coming out", she became full of adventure and self-affirmation. That is, until she got caught up in an online group chat sting. "I was really enjoying the new attention and began flirting in chat rooms which led to my federal case. My first couple of years in prison were especially hard because this system is not designed for people with gender dysphoria. However, a few years ago Seagoville began transgender group sessions under the psychology department, but that stopped a year ago and now we don't even know each other and the new girls are always asking questions about the process of transitions. I do the best I can to explain, but I end up referring them to psych."

Dr. Hernandez, Chief Psychologist at Seagoville, responded to this issue by telling the Bars & Stripes that, "The BOP is actively engaged in meeting the needs of the transgender population and has recently begun the process of hiring a Women's and Special Population Coordinator to begin work at Seagoville sometime in the fall. This will greatly expedite the services and meet the individual needs of our transgender adults-in-custody." For Jenny, the importance of having a coordinator can only make the process of transitioning more efficient. "Living as a woman in here has not been easy. I went through a lot of red tape just to begin the process." But completing the process is even more problematic with Jenny describing it as having two phases.

To get the surgery, she will have to complete one year at a women's prison. However, a sex offender must first complete the BOP's one year Sex Offender Management Program (SOMP), which can only be taken within 24 months of prison release, before a transfer to a women's prison can happen. As these policies clearly do not leave her enough time to comply with them and still get the surgery, Jenny challenged it all the way to Washington, DC, which recently resulted in her being offered SOMP with 32 months remaining until her release from prison. Reflecting on her successful challenge of these policies, Jenny added, "If my efforts make it easier for other trans girls, then I call that a win."

Veteran's Mental Health Committee

Proudly Invites

All Veterans

To Our Personal Healing Sessions!

Every Saturday @ 2 PM

Building #10 / Upstairs Dayroom

Mingle and share with us your military, prison, and life experiences.

> Got disappointments? Got grief? Got rants?

We will sit, we will listen, and we won't judge. Just us Vets!

What's that? You would also like to use the B&S to amplify your VICs committee announcements? Well, get it in by 8/4 to have it published in the August issue!

(German, Continued from Page 1)

with the original German version (Vol. 1/No. 2, dated Sept., 11, 1943), in which, you will discover A) the winner of their new newspaper name competition; B) a train-side party for the departure of the entire Japanese colony from Seagoville, during which, their American Warden played Japanese march tunes for them on his accordion; C) the inventory & financial health of their commissary (canteen), and D) the German who made the weather vane that still adorns the top of the prison auditorium today.

(See attached German newsletter)

The FCI-Seagoville Bars & Stripes is committed to the ethical, objective, responsible, fair & inclusive journalism for the purpose of restoring honor and dignity to the incarcerated veteran community at large.

Robert Williams, Chair B&S Committee / Art Mgr

Erik Miltonhall, Co-Chair B&S Committee

Randall Morris, Editor-in-Chief & Layout





Vol. I No. 2 Sengaville , T e x a s den 11, September 1943 Unser Mctta ist :" GEMETHAMTZ VOR EIGENAUTZ ", ist es such Dein's ?

Ein dreifaches Hoch

dem gluecklichen " winnah " unseres Preisuusschreibens : Kameraden Grellert von Haus 6 "Nun hat unser Kaesebleettchen
einen christlichen Manen , und wollen wir nur hoffen , dass die als
Preis ausgesctizte 6 Plaschen Hich bei wohlverdienten "grossen Taufgelign ist unser Baby kein Kaeceblatt zehr , denn es hat nun in Auch
schrere Blaetter , Tiegen werden sie dazu such noch , hinseln in
Thre Haeuser - in Thre Hersen , und schliesblich auch spacter in die
welte Welt Hinaus !
Filogrende Blaetter " sollen en von mun acia, incheon die Schreiselle Hinaus en schreit in der Bereit in der Bereit werden der Besten
lies Blaetter aus der Bereit in der Bereit in der Bereit werden der Besten
liesen bereit su tieden "Soleten Einsendungen den besten
länen bereit su tieden "Lagerklange" und "Beoblachter"(Der Füehrer
durchs Camp) und einige andere wurden lange erwogen, eber schliesblich
wurde dem Gestsebblitz von Herrn Grellert einstimmig der Preis zugesprechen . Prosit !

ité Yohn :

| Te Yohn : | Die Redaktion denkt | Lesern die unser lande nieuwe des Dorfes Sesgoville ereignissele de Dorfes Sesgoville ereignissele ereignissele de Dorfes Sesgoville ereignissele ereig

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Seagoville Flying Pages

Vol. 1 No. 2 Seagoville, Texas the 11th of September, 1943

Our Motto is: " Community Interest Before Self-Interest ", is it also your's?

A Triple Cheer

Comrade Grellert, in building #6, is the "winnah" of our competition. Now, our Cheese Gazette darling has a proper Christian name and we hope that a prize of six bottles of beer will be set aside for him and passed around at the big, well-deserved "christening". Well, our baby is not a Cheese Gazette anymore, for it also now has more pages, but it will still fly - into your buildings - into your hearts, and eventually, out into the wide world! "Flying Pages" is what it will be called from now on but the blood of a true editor seems to sweat from the over 150 very good name suggestions we received in response to our search for the best name. "Camp Sounds", "The Observer - Your Leader Through The Camp", and some others were carefully weighed but, in the end, it was unanimous that the genius from Mr. Grellert should take the prize. Cheers!

The Week

One for the circumstances of the Seagoville Camp, an eventful week lies behind us. The monotony of the camp life was broken up by an incident that will stay in the memories of our citizens. We refer to the "Goodbye" party a few days ago for the departing Japanese colony, which provided a better fate for them in that they were travelling back to their distant homeland.

The day that our fate-sharing companions departed was very impactful and had a touching effect on many of us. The majority of our German inhabitants had assembled to say a last goodbye to our friends. It would have been nice if our musicians would have attended the celebration, but the Camp Warden didn't miss the opportunity to accompany our songs and hymns on his accordion, and the Japanese marches that he played visibly moved those who had assembled on the train. The waving of hands and hankerchiefs then commenced, the train began to move slowly forward and under the blue Texas sky rang out the hope that: "We will see each other again at home." ...

In between these departures, some of the German camp residents had happy reunions with old friends who had arrived [at Seagoville] deep in the night from Ellis Island.

The camp newspaper takes this opportunity to welcome these new guests and we would like to invite them to become regular readers of our paper.

(Continued on Page 2, Column 1)

The Editorial Staff Would Like To Thank:

All of our readers who have so joyously and charitably supported our "Cheese Gazette". The financial tight spot that we were in is already solved; paper and printing "stencils" have been provided - Now, the work can begin.

A special thanks to the Raabe and Paschendorf families for their donations of 50¢ each towards the set up of the newspaper. We want to take this opportunity to remind everyone that all donations and every nickel that is left over after the printing costs are paid will be used for the public good either through competitions as grants or for non-profit purposes.

The Adult Education School Has Begun:

The classes of the adult education school officially began on September 6. Approximately 150 students registered on the lists that were handed out. For the Ellocution class that is headed by Mr. Koetter and Dr. Weseman, both women and men are still needed. For all details, see the schedule that has been posted in every building.

Through a collaboration with Mr. Grellert, the ever-popular drawing class offered by Mr. Steiner will become advanced and will be regularly offered beginning Tuesday the 14th of this month - Well, it will certainly be cooler, so: Off to school with you!"

[Translated by Randall Morris, editor of the Bars & Stripes inmate newsletter of FCI-Seagoville, Texas - 7/22/2024] Continued
From Page 1, Column 1

And then, something big happened: The beer was suddenly delivered! One almost couldn't believe this after such a long wait and the frequent disappointments. But now, it was really there. First, a glimpse of the cases of longnecked bottles could be seen in the kitchen and after dinner, everyone was served the delicious barley juice on the table. Even so, there is roughly only enough for one bottle per couple, but a few fortunate could score another bottle. Then, that big moment comes, when you cautiously put the bottle to your lips and let the delighfully wet gourmet trickle down over the palate. How does it taste? Ah, you already know. Cheers!

They say that in times that lack important news, the newspaper reporter will report on the weather, and that might be true. But despite the risk of being viewed in this way, we must, of course, definitively state that it has become noticeably cooler within the last few days. After the roasting and boiling heat that was almost unbearable in the last week, this drastic change has earned a mention. Those who haven't felt the gentle cooling breeze only need to look at the clothing of the weaker sex, who has already begun to cover their beauty with longer dresses. And a look at the new weather vane explains the miracle, the first north wind has begun as the first sign of the end of summer; perhaps it brings the first snowflakes for our comrades in the far north; for us in the south, it brings us the pleasant cool off that refreshes our spirits and wills.

Building 5

Everyone shouted for joy, everyone was entertained, and, why not? So, the biggest birthday party that both our boys, Erich and Rudi Schoenfeld, have ever experienced will stay in the memories of everyone for a long time. Above all, the lovely birthday cake from uncle Herman was a masterpiece. The decorations, the laughing faces, the good humor and the plentiful presents left no doubt that both boys are well-liked. Mamma and Papa Schoenfeld took

plenty of care to ensure that every individual guest, whether big or small, was thoroughly entertained with food and drink -- By the way, if, in the future, a Ms. X one day serves coffee that happens to not taste so good, or her dress is not exactly so-so or is not how she wants it, then, you no longer need to make your mouth sore talking about it. Simply come to me, I'll send in the story, it will get printed and already the whole camp will know about it.

E.B.

Building 6

Without a doubt, the life of a newspaper correspondent is difficult. Just now, I had to destroy my five page editorial about: "The Moral Influence Of Beer On An Internee's Condition Of The Soul". The effect of beer is so negligible, that it is absolutely not worth discussing. I have, however, taken the trouble to mathmatically calculate how much alcohol each of us has received. It is exactly .039746 grams per person, so, in other words, not even a drop on a hollow tooth. Because of a lack of time (better- lack of space, Ed.), I want to do this like a familiar doctor turns in a two page report about his patient which describes what his patient doesn't have. So, we didn't have any birthdays this week, nobody broke their leg while cleaning, nobody fell unconscious during K.P., etc. - Speaking of K.P., I want to insert some praise for our newly chosen speaker, Mr. Frey, who calmly and, above all, with patience achieved the assembly of 3 volunteer groups that jumped in on Sunday to complete the 3 regular K.P. groups. As a thank you, we had cake yesterday and everyone could eat as much as he wanted.

Also, because of the lighter building chores, we have laid the groundwork for some sports, art, and games. We had an interesting meeting with the sports trainer, Mr. Glass, who is well versed and has agreed to be available for our building and will soon start the activities. He will also show the unsporty a way to build the body. A well known latin saying,

"mens sana in corpore sana"
[Latin for: Healthy mind, healthy body]

SE

An Oak (acorn) Wreath [Accolades] For; Our volunteer canteen staff.

Mr. Wolff Mr. Herde Mr. Merkens Ms. Fischer

Did you also know that, up until the end of July of this year, our canteen workers voluntarily worked without pay for our collective benefit? Our always friendly and helpful comrades Wolff and Herde have been working since last December and our witty "Master of Ceremonies" Merkens, since January. The addition of Ms. Fischer has now complemented this trio with feminine dignity since July, and we want to hope that the question that still hangs over the payment of wages under the camp employment program will be satisfactorily solved soon.

With, literally, \$50.00, our canteen began and it now has a stock inventory value of \$2,571.00. The total sales for last month was approx. \$3,000 (but this was under exceptional conditions due to the departure of the Japanese), and \$644, alone, was paid out from the profit last month for, among other things, \$299 for fruit; \$211 for the Japanese departure party and \$57 for [camera] film.

Therefore and with pride, we place our very first Oak (acorn) Wreath upon these comrades. May your joyful contribution to our communal well-being serve as a shining example.

Building 7

What happened here is a long story. Hardly had one of our cooks finished making a thick and artificially rubbery mass that should have been a pudding that would be served for lunch, when a Rush-Telegram from Washington [DC] with a big offer was delivered.

The cook was speechless, she was now a "Made Man" because all she had to do now to secure her patent for her "excellent artificial rubber" was to send back the chemical formula and manufacturing process.

With tears in her eyes, she embraced her husband around his neck while he proudly looked at his darling and she sobbed, "Sweety, forgive me for I don't remember what all I put into it." (Glory in this world is very short. Editor)

Building 11 : Fire Alarm

The fire department is necessary everywhere,
Then when it is really on fire,
The money is transformed into ashes,
That was hidden in bedstraw or grandma's hat.
The other day, someone had sounded the alarm,
Then the whole camp cried out in utter horror,
"Dear Lord, the flames are raging,
Over here with the hose, bring out the fire dept."
(We must stop here because we are running out of room. The verse continues on next page. Ed.)

The Weather Vane

Attention! Present arms! Eyes, right! Ready, front! Weapon down, at ease! This honor goes to our friend, Mr. Doerfler, for his new weather vane. He really made it beautiful and comrade Kolba added the "shine and shimmer" to this masterpiece. Both men are, herewith, awarded the title "Weather Vanerich". Well, such a weather vane is very valuable, particularily in this country, that one does not know, even here and now, which way the wind blows.

Here are some rules when observing the weather vane:

- <u>1</u>) If you can't see the weather vane, it is either foggy or somebody has stolen it. (Notify the authorities)
- 2) If the weather vane is dry, it is with certainty that you may conclude that it isn't raining at the moment.
- 3) If it is wet, it is either a) the fireman has hosed it down, or b) it has rained.
- 4) If the weather vane is covered in ice or snow, it is a mirage or, in plain english: Somebody is nuts.
- 5) If the metal ball is melted and the spindle is glowing red hot with heat, then it is simply summer.
- 6) If the vane doesn't move, there is no wind or it is rusted. In the latter case, you can readily find someone who would be willing to manually move it according to the wind out of principle.
- 7) If the vane is gone, the tower destroyed and the auditorium in a heap of rubble, every building will have to decide for itself whether an earthquake, hurricane, or a Stuka attack is responsible for it. The decision of the building custodian is final. (Dixi)

[The sentences past this point are illegible and incomplete.—Translation Editor]

R

Case 3:24-cv-03148-X-BW Document 3 Fire Alarm (Continued)

Of course, our fire extinguishing cadet sleeps on the bed and dreams full of thirst that he has a giant glass of schnapps in front of him,

the steam siren went unnoticed by him.

His dear wife shook him awake: Nicko, it burns; she shouted in full despair. He scampered out in his underwear so fast, that the dirt flew from around his ears like crazy.

Meanwhile, his collegue was in the canteen and had just refreshed himself with a Coca Cola and was thinking about liquors and fine cognacs and had also not noticed the alarm.

You now raise your hands in protest saying "No, this would definately not happen to us," Because, according to regulations, all Firemen must have 24 hour advanced notice...!

Tralala

Must This Be ?

The hot water is a blessing,
One needs to have some purpose in the camp
One can lie in the bathtub
And how through magic the dirt disappears.
However, when one quickly walks away
after their bath and forgets the residue,
And is carefree about sharing the load by
leaving the bathtub dirty: -The other bathroom users say: "Must this be?"

Ellocution Class

You missed something! The first hour in the study of the German language taught by Mr. Koetter and Dr. Weseman was a bullseye. What is that you ask?: "I already know German!" Naturally, we know that you can speak "German", otherwise, you wouldn't be in an internee camp for Germans. But really, dear ladies and gentlemen, all jokes aside, in this highly interesting hour , you could all still learn something. Do you get stage fright whenever you must "publicly" speak in front of your building assembly meetings? Can you think on your feet? Or, do you simply become speechless? This German hour on Mondays and Thursdays at 7 o'clock has all the signs of becoming the springboard in the camp. It is never boring, we have a lot of laughs and it will be a lot of fun for you, too. Everyone should come as we need a full house in the next Ellocution Class to cause the right reaction in all of our hearts.

Filed 12/13/24 Page 165 of 213 PageID 168 Eduardchen & Minniken Talk Nonsense:

Strehnsch zings heppen in our villetsch. In the nighttime hours we see men and women going out to steal. Whereto? Shhh, shhh - schur enuff, it was found out the next day that: married couples can now increase their family size without running the risk of being vershippt to Crystal City. The best part of it is that you don't have to buy the whole "Kit-n-Kaboodle" because you can choose between black-white, gray, or brown. Are you also looking to increase your family? -- But listen, yesterday the matron for building #7 received a fohnkahl from the former Japanese colony section of the camp informing her that the son of the Steiner family has been over there crying and scratching in the sand for quite a while. "Gee," answered the matron, "the Steiner family has no kids!" "Oh, yes, they do," came the response, "the wild boy's name is 'Fritzi' and he has his full name and address hanging around his neck." "Let me check," said the matron but after checking with the family again yesterday, he had not been returned to them. Well, in the end, somebody had to run over there and even though the boy still needed a camp "pass", the newest addition to the Steiner family came back, and to the surprise of the building matron, it was confirmed that the cat really did have a collar with the name 'Fritzi Steiner" around the neck. The good matrone swooned but the Steiner family was jubilant that they were reunitied. truly juhrs... E.&M.

Classified Ads

Fountain Pen lost. 14 carat gold, rust brown glaze. Reward for finder. Turn in to canteen.

Men & Women's Haircuts Men- 15¢ in the Seagoville "Clipping Joint". Auditorium - Room #10.

Hours: 12:30 to 4:30

Portraits and Sketches of the life from \$1.00 up, based on size and workmanship. Silhouettes — Heads, 50¢--- Painted Portraits from \$10 up (not more than \$20) Humorous Illustrations or Postcards, etc. approx. 75¢ -- Sketches of the camp. -- Rhyming Humor for special occasions.

> Reasonable - - - - Artistic Steiner & Co., Building #7

The poetic vein has burst!

Many are impatient and every time we turn around the water pipes are bursting, but the biggest boom was caused last week with the

bursting of the poetic vein. The poetic tidal wave of approx. 15 poems we received was a joy but due to a lack of space, we must ask you to be patient for us to publish them.

Exhibit H

ASS of complant

LEGAL WRITERS WANTED

Prison Legal News and Criminal Legal News are searching for the top incarcerated legal talent in the country to join our writing staff.

If you are a successful jailhouse lawyer, were a practicing paralegal or lawyer prior to incarceration, or are a self-taught legal authority and are interested in writing about the most fascinating and helpful state and federal appellate court opinions, then we want to hear from you today.

To express your interest for consideration, please submit (1) a statement of interest describing your relevant legal background, skills, and experience together with an explanation of why you want to write for our legal publications and (2) at least two legal writing samples.

Submissions can be sent (1) by mail to: Criminal Legal News, ATTN: Richard Resch, Senior Managing Editor, P.O. Box 1151, Lake Worth Beach, FL 33460 or (2) by email to: info@criminallegalnews.org.

November 2024

PUBLISHED HUMAN RIGHTS DEFENSE

VOL. 35 No 5 ISSN 1075-7678

Dedicated to Protecting Human Rights

May 2024

BOP Rolls Out Veterans-Only Housing at Federal Prison in Texas

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Federal prisoner Randall Morris, 57, said the program was announced in April 2023. He described it as "an honor unit" with heightened conduct standards and expectations. Prisoners housed there also get "special veterans programming" as well as

"community re-entry emphasis/assistance" and "veterans only benefits and amenities."

"Most of these benefits and amenities are token but, in a prison environment, they are substantial," added Morris, a veteran

The new program is a prototype not yet available in other lockups operated by the federal Bureau of Prisons (BOP). However, prisoner/veterans there do not have the opportunity to participate in one of 22 dog-training programs BOP operates at other prisons, Morris noted. That means those programs' therapeutic benefits are also not available to veterans, though they face a higher suicide risk than other prisoners.

The state Department of Criminal Justice (TDCJ) opened its first Veterans Re-entry Dorm at Travis State Jail in July 2014. Harris County opened a similar unit at its jail in Houston in February 2019.

Sources: Houston Chronicle, Vanguard at Berkeley



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Excerpt Of Literary Works

The short story and essay titles below are included in Exhibit H, and represent an excerpt of a much larger literary work that I attempted to have photocopied at FCI—Seagoville pursuant to the explicit instructions of the copyright application form from the U.S. Copyright Office. My photocopies of the application form and the literary works were denied by SOE Howard because she deemed my documents as "nonlegal".

The following excerpt titles of my work follow:

- 1. Paying For Much More Than Our Life's Mistakes
- 2. BOP Offers Higher "Degrees"
- 3. A Life And A Space To Contemplate
- 4. Good Morning, Sweetheart!
- 5. Humor In Journalism Sadly For Some, Its No Laughing Matter
- 6. Charged with murder in Arkansas? Hire a part-time defense attorney!
- 7. It's Over! France Surrenders! (Again)

Case 3:24-cv-03148-X-BW Document 3

Filed 12/13/24

For a Nondramatic Literary Work UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

For curvent tase, check the Copyright Office

= website at www.copyrlaht.gov. write the Gopy-

right Office, or can (202) 707-2000.

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	If published in a periodical or serial a	give: Volume ▼ Number ▼	Issue Date ▼	On Pages ▼		
6	NAME OF AUTHOR ▼		DATES OF BIRTH AND Year Born ▼ Year	DEATH Died ▼		
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MORE ON BACK ▶ • Complete all applicable spaces (numbers 5-9) on the reverse side of this page.

· See detailed instructions.

· Sign the form at line 8.

DO NOT WRITE HERE

	Case 3.24-cv-03148-X-BW Document 3	EXAMINED BY	eiD 1	FORM TX
		CHECKED BY	-	
		CORRESPONDENCE	- -	FOR OPYRIGHT OFFICE USE ONLY
	DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MOR	E SPACE, USE A SEPARATE CONTINUATION SHEET.		
Yes N a. This is to b. This is to c. This is a	S REGISTRATION Has registration for this work, or for an earlier of the sound of the sound of the first published edition of a work previously registered in unpublish the first application submitted by this author as copyright claimant. In a changed version of the work, as shown by space 6 on this application of the york, as shown by space 6 on this application of the york.	(Check appropriate box.) ▼ whed form.		5
	VE WORK OR COMPILATION Material Identify any preexisting work or works that this work is base	ed on or incorporates. ▼	3 1	e instructions
Material Ado	ded to This Work Give a brief, general statement of the material that h	has been added to this work and in which copyright is claimed. ▼		fore completing s space.
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^{*17} U.S.C. §506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

Detach and read these instructions before completing this form.

Make sure all applicable spaces have been filled in before you return this form.

BASIC INFORMATION

When to Use This Form: Use Form TX for registration of published or unpublished nondramatic literary works, excluding periodicals or serial issues. This class includes a wide variety of works: fiction, nonfiction, poetry, textbooks, reference works, directories, catalogs, advertising copy, compilations of information, and computer programs. For periodicals and serials, use Form SE.

Unpublished works: This form may be used to register one unpublished work. This form cannot be used to register a "collection" of two or more unpublished works. Any paper application submitted with more than one unpublished work may be refused. To register multiple unpublished works, you must use the online application for "A Group of Unpublished Works." For information about the online application, see *Multiple Works* (Circular 34).

Deposit to Accompany Application: An application for copyright registration must be accompanied by a deposit consisting of copies or phonorecords representing the entire work for which registration is to be made. The following are the general deposit requirements as set forth in the statute:

Unpublished Work: Deposit one complete copy (or phonorecord)

Published Work: Deposit two complete copies (or one phonorecord) of the best edition.

Work First Published Outside the United States: Deposit one complete copy (or phonorecord) of the first foreign edition.

Contribution to a Collective Work: Deposit one complete copy (or phonorecord) of the best edition of the collective work.

The Copyright Notice: Before March 1, 1989, the use of copyright notice was mandatory on all published works, and any work first published before that date should have carried a notice. For works first published on and after March 1, 1989, use of the copyright notice is optional. For more information about copyright notice, see *Copyright Notice* (Circular 3).

For Further Information: To speak to a Copyright Office staff member, call (202) 707-3000 or 1-877-476-0778 (toll free). Recorded information is available 24 hours a day. Order forms and other publications from the address in space 9 or call the Forms and Publications Hotline at (202) 707-9100. Access and download circulars, certain forms, and other information from the Copyright Office website at www.copyright.gov.

PRIVACY ACT ADVISORY STATEMENT Required by the Privacy Act of 1974 (P.L. 93-579)

The authority for requesting this information is title 17 U.S.C. §409 and §410. Furnishing the requested information is voluntary. But if the information is not furnished, it may be necessary to delay or refuse registration and you may not be entitled to certain relief, remedies, and benefits provided in chapters 4 and 5 of title 17 U.S.C.

The principal uses of the requested information are the establishment and maintenance of a public record and the examination of the application for compliance with the registration requirements of the copyright code.

Other routine uses include public inspection and copying, preparation of public indexes, preparation of public catalogs of copyright registrations, and preparation of search reports upon request. NOTE: No other advisory statement will be given in connection with this application. Please keep this statement and refer to it if we communicate with you regarding this application.

LINE-BY-LINE INSTRUCTIONS

Please type or print using black ink. The form is used to produce the certificate.

SPACE 1: Title

Title of This Work: Every work submitted for copyright registration must be given a title to identify that particular work. If the copies or phonorecords of the work bear a title or an identifying phrase that could serve as a title, transcribe that wording *completely* and *exactly* on the application. Indexing of the registration and future identification of the work will depend on the information you give here.

Previous or Alternative Titles: Complete this space if there are any additional titles for the work under which someone searching for the registration might be likely to look or under which a document pertaining to the work might be recorded.

Publication as a Contribution: If the work being registered is a contribution to a periodical, serial, or collection, give the title of the contribution in the "Title of This Work" space. Then, in the line headed "Publication as a Contribution," give information about the collective work in which the contribution appeared.

SPACE 2: Author(s)

General Instructions: After reading these instructions, decide who are the "authors" of this work for copyright purposes. Then, unless the work is a "collective work," give the requested information about every "author" who contributed any appreciable amount of copyrightable matter to this version of the work. If you need further space, request Continuation Sheets. In the case of a collective work, such as an anthology, collection of essays, or encyclopedia, give information about the author of the collective work as a whole.

Name of Author: The fullest form of the author's name should be given. Unless the work was "made for hire," the individual who actually created the work is its "author." In the case of a work made for hire, the statute provides that "the employer or other person for whom the work was prepared is considered the author."

What Is a "Work Made for Hire"? A "work made for hire" is defined as (1) "a work prepared by an employee within the scope of his or her employment"; or (2) "a work specially ordered or commissioned for use as a contribution to a collective work, as a part of a motion picture or other audiovisual work, as a translation, as a supplementary work, as a compilation, as an instructional text, as a test, as answer material for a test, or as an atlas, if the parties expressly agree in a written instrument signed by them that the works shall be considered a work made for hire." If you have checked "Yes" to indicate that the work was "made for hire," you must give the full legal name of the employer (or other person for whom the work was prepared). You may also include the name of the employee along with the name of the employer (for example: "Elster Publishing Co., employer for hire of John Ferguson").

"Anonymous" or "Pseudonymous" Work: An author's contribution to a work is "anonymous" if that author is not identified on the copies or phonorecords of the work. An author's contribution to a work is "pseudonymous" if that author is identified on the copies or phonorecords under a fictitious name. If the work is "anonymous" you may: (1) leave the line blank; or (2) state "anonymous" on the line; or (3) reveal the author's identity. If the work is "pseudonymous" you may: (1) leave the line blank; or (2) give the pseudonym and identify it as such (for example: "Huntley Haverstock, pseudonym"); or (3) reveal the author's name, making clear which is the real name and which is the pseudonym (for example, "Judith Barton, whose pseudonym is Madeline Elster"). However, the citizenship or domicile of the author must be given in all cases.

Dates Gasen 3.24-CVT-9311-48ttN-BWad, the occurrent 3 that Filed 1.2/13/12/4han the age 1.7/2e of 1.2/13 copy Placed Date in the earthe year of death be included in the application unless the work is anonymous or pseudonymous. The author's birth date is optional but is useful as a form of identification. Leave this space blank if the author's contribution was a "work made for hire."

Author's Nationality or Domicile: Give the country of which the author is a citizen or the country in which the author is domiciled. Nationality or domicile must be given in all cases.

Nature of Authorship: After the words "Nature of Authorship," give a brief general statement of the nature of this particular author's contribution to the work. Examples: "Entire text"; "Coauthor of entire text"; "Computer program"; "Editorial revisions"; "Compilation and English translation"; "New text."

SPACE 3: Creation and Publication

General Instructions: Do not confuse "creation" with "publication." Every application for copyright registration must state "the year in which creation of the work was completed." Give the date and nation of first publication only if the work has been published.

Creation: Under the statute, a work is "created" when it is fixed in a copy or phonorecord for the first time. Where a work has been prepared over a period of time, the part of the work existing in fixed form on a particular date constitutes the created work on that date. The date you give here should be the year in which the author completed the particular version for which registration is now being sought, even if other versions exist or if further changes or additions are planned.

Publication: The statute defines "publication" as "the distribution of copies or phonorecords of a work to the public by sale or other transfer of ownership, or by rental, lease, or lending." A work is also "published" if there has been an "offering to distribute copies or phonorecords to a group of persons for purposes of further distribution, public performance, or public display." Give the full date (month, day, year) when, and the country where, publication first occurred. If first publication took place simultaneously in the United States and other countries, it is sufficient to state "U.S.A."

SPACE 4: Claimant(s)

Name(s) and Address(es) of Copyright Claimant(s): Give the name(s) and address(es) of the copyright claimant(s) in this work even if the claimant is the same as the author. Copyright in a work belongs initially to the author of the work (including, in the case of a work made for hire, the employer or other person for whom the work was prepared). The copyright claimant is either the author of the work or a person or organization to whom the copyright initially belonging to the author has been transferred.

Transfer: The statute provides that, if the copyright claimant is not the author, the application for registration must contain "a brief statement of how the claimant obtained ownership of the copyright." If any copyright claimant named in space 4 is not an author named in space 2, give a brief statement explaining how the claimant(s) obtained ownership of the copyright. Examples: "By written contract"; "Transfer of all rights by author"; "Assignment"; "By will." Do not attach transfer documents or other attachments or riders.

SPACE 5: Previous Registration

General Instructions: The questions in space 5 are intended to show whether an earlier registration has been made for this work and, if so, whether there is any basis for a new registration. As a general rule, only one basic copyright registration can be made for the same version of a particular work.

Same Version: If this version is substantially the same as the work covered by a previous registration, a second registration is not generally possible unless: (1) the work has been registered in unpublished form and a second registration is now being sought to cover this first published edition; or (2) lier registration, and the author is now seeking registration in his or her own name. If either of these two exceptions applies, check the appropriate box and give the earlier registration number and date. Otherwise, do not submit Form TX. Instead, write the Copyright Office for information about supplementary registration or recordation of transfers of copyright ownership.

Changed Version: If the work has been changed and you are now seeking registration to cover the additions or revisions, check the last box in space 5, give the earlier registration number and date, and complete both parts of space 6 in accordance with the instructions below.

Previous Registration Number and Date: If more than one previous registration has been made for the work, give the number and date of the latest registration.

SPACE 6: Derivative Work or Compilation

General Instructions: Complete space 6 if this work is a "changed version," "compilation," or "derivative work" and if it incorporates one or more earlier works that have already been published or registered for copyright or that have fallen into the public domain. A "compilation" is defined as "a work formed by the collection and assembling of preexisting materials or of data that are selected, coordinated, or arranged in such a way that the resulting work as a whole constitutes an original work of authorship." A "derivative work" is "a work based on one or more preexisting works." Examples of derivative works include translations, fictionalizations, abridgments, condensations, or "any other form in which a work may be recast, transformed, or adapted." Derivative works also include works "consisting of editorial revisions, annotations, or other modifications" if these changes, as a whole, represent an original work of authorship.

Preexisting Material (space 6a): For derivative works, complete this space and space 6b. In space 6a identify the preexisting work that has been recast, transformed, or adapted. The preexisting work may be material that has been previously published, previously registered, or that is in the public domain. An example of preexisting material might be: "Russian version of Goncharov's 'Oblomov."

Material Added to This Work (space 6b): Give a brief, general statement of the new material covered by the copyright claim for which registration is sought. Derivative work examples include: "Foreword, editing, critical annotations"; "Translation"; "Chapters 11-17." If the work is a compilation, describe both the compilation itself and the material that has been compiled. Example: "Compilation of certain 1917 speeches by Woodrow Wilson." A work may be both a derivative work and compilation, in which case a sample statement might be: "Compilation and additional new material."

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SPACE 7, 8, 9: Fee, Correspondence, Certification, Return Address

Deposit Account: If you maintain a Deposit Account in the Copyright Office, identify it in space 7a. Otherwise leave the space blank and send the fee with your application and deposit.

Correspondence (space 7b): Give the name, address, area code, telephone number, fax number, and email address (if available) of the person to be consulted if correspondence about this application becomes necessary.

Certification (space 8): The application cannot be accepted unless it bears the date and the signature of the author or other copyright claimant, or the owner of exclusive right(s), or the duly authorized agent of author, claimant, or owner of exclusive right(s).

Address for Return of Certificate (space 9): The address box must be completed legibly because the certificate will be returned in a window envelope.

What Is Mandatory Deposit?

All copyrighted works that are published in the United States are subject to the "mandatory deposit" provision of the copyright law. As a general rule, this provision requires that two complete copies of the "best edition" of a copyrightable work published in the United States be sent to the Copyright Office for the collections of the Library of Congress within three months of publication. The "best edition" of a work is "the edition, published in the United States at any time before the date of deposit, that the Library of Congress determines to be most suitable for its purposes." The owner of copyright or of the exclusive right of publication may comply with this requirement either by submitting the best edition of the work when registering the work with the Office or by submitting the work without seeking a registration and solely for the purpose of fulfilling the mandatory deposit requirement. The mandatory deposit provision helps ensure that the Library of Congress obtains copies of every copyrightable work published in the United States for its collections or for exchange with or transfer to any other library.

For more information, see Mandatory Deposit of Copies or Phonorecords for the Library of Congress (Circular 7D) and Best Edition of Published Copyrighted Works for the Collections of the Library of Congress (Circular 7B).

8

Paying For Much More Than Our Life's Mistakes

This essay was expensive and tedious to create. Just to begin writing it required an original investment of exactly \$25.45, which is just under the \$30 per month that the Federal Bureau of Prisons is legally allowed to pay me for my prison labor under the slavery exception clause of the Thirteenth Amendment of the U.S. Constitution.

Then, each subsequent keystroke and each correction whittled away at that investment. The only alternative to this cost is to write it by hand but that would degrade the intended impact and presentation much like showing up for a job interview dressed in gardening attire would. In fact, the Supreme Court recognized the depth of presentation bias when it held that an inmate in a civil case does not have to appear before a jury dressed in jail or prison garb due to the prejudicial effect that such a presentation can evoke. (Estelle v. Williams (1976))

Unfortunately, the volume and quantity of my essays, pro se legal filings and college correspondence course work reduces this investment to \$0 surprisingly fast requiring further investments of \$25.45 ad infinitum, or at least for as long as I have a need and desire to create presentable and readable documents. And once my documents are finished, there is no way for me to save my work for future edits or to copy & paste from my documents despite the exhorbitant cost that I incur to create them.

The Swintec® 7000 User's Manual confidently states that, "Your new Electronic Typewriter increases your typing efficiency through the use of the most advanced technology." This statement was quite likely true when Sputnik was launched but it is now the fourth quarter of 2023 and if it were not for my incarceration at FCI-Seagoville, I could simply go to the local library to digitally create and save my work free of charge or, I could speak it into existence and digitally save it using Artificial Intelligence. Speaking of which, the fact that I am incarcerated is some measure of assurance that this essay is original and not created by AI.

In 2022, the FCI-Seagoville inmate commissary sold the following ribbons for the Swintec® 7000 typewriters:

Adler-Royal

\$ 8.95 Black Correctable Typewriter Ribbon Product No. 285

No Name Correction Ribbon (manufacturer & item # unknown)

In the fourth quarter of 2022, the retail.price of that typewriter ribbon dramatically jumped to \$15.60 and the correction ribbon jumped to \$3.90. (See attached sales receipts reflecting all of these prices and dates)

Then, in the summer of 2023 (less than one year later), the typewriter ribbon price soared again to \$21.55 but this time the ribbon seems to be coming from a different reseller according to the sticker affixed to the ribbon cellophane packaging that reads: "AROUNDTHEOFFICE.COM REORDER NUMBER SC-800-COM 1-800-816-6855." These exponential retail price hikes are particularly and suspiciously egregious considering that the FCI-Seagoville Education Center is internally paying only \$10 for the actual manufacturer's ribbon. (Swintec 7000 Ribbon Re-Order #: SWS 1009)

Meanwhile, almost one year ago FCI-Seagoville took delivery of BOP authorized word processors that would solve this problem but the current Supervisor of Education ("SOE") at FCI-Seagoville has so far failed or refused to install them despite that she had been criticized in April, 2023, by a visiting federal judge (Josh Duggar's sentencing judge) after he had expressed shock at seeing typewriters in use in her education building. All the while, the word processors have been collecting dust in a storage room while inmates struggle to afford typing ribbons.

This same SOE has recently imposed arbitrary and extreme restrictions on inmate use of the BOP typewriters and Trust Fund photocopy machine which are all kept in her Education Center building. (Inmates purchase photocopy cards from Trust Fund/Commissary at \$6.50 for 50 copies) These restrictions include an impossible schedule of only one hour per day access to the copy machine which is then rendered even more restrictive by the incessant weekly Education Center closures due to staff shortages and three recent "Going Away" parties for BOP staff. There are no make-up copy sessions scheduled to offset these closures as this SOE does not consider that pro se inmates have filing deadlines with the court and other urgent legal needs.

Furthermore, this SOE has crafted an arbitrary self-made "policy" that now dictates that the typewriters and photocopy machine are for "legal documents only" which is contradictory to BOP Program Statement 5350.27 which encourages inmates to create and duplicate manuscripts, fiction, nonfiction, poetry, music/lyrics, college correspondence course work, religious materials, etc. Worse yet, this SOE frequently changes her definition of "legal documents" when determining whether to allow use of the machines by often declaring that "the legal documents must be related to the inmate's criminal case" to type or duplicate them. To everything else, her pat response is that, "you can write it by hand."

This arbitrary and unsupported "policy" was recently tested when an inmate requested to use the copy machine to photocopy a Copyright Application Form and to make the two copies of the original literary work that is specified in the U.S. Copyright Office instructions that accompanied the copyright application. The SOE denied the inmate use of the copy machine for these copies stating that "they are not legal documents." When she was respectfully told that they are, indeed, considered to be legal documents, she replied that, "they are not related to your criminal case." She further exposed her unstable rationale by adding, "And, you are not allowed to run a business from the BOP", seemingly implying that she equates applying for a copyright with operating a business.

When asked to copy some paralegal correspondence course work before sending the originals in the mail to the school, the SOE responded that she might allow the copies to be made if the inmate can provide her with "a letter from your school showing that the school requires students to make copies before mailing course work." No school would write such a ridiculous letter as it is commonsense to make a copy before mailing anything in the mail.

This SOE recently posted a sign in the Education Center threatening disciplinary action against inmates who use the typewriters for anything other than legal docs. When an inmate was subsequently asked what he was typing on the typewriter his response was, "A Prison Release Plan, mam." To which she shrilled, "Not on my watch! Legal documents only!"

I would like to point out that FCI-Seagoville is a **low security** prison and the current cultural shift and political push for domestic prison reform is reflected in the stated goals of the 2018 First Step Act as well as the stated objectives of the new BOP Director, Colette Peters. The emphasis is heavy on rehabilitation, programming, productive activity engagement and community re-entry. And the empirical data

compiled since the signing of the First Step Act show that the rehabilitative approach is working if the lower recidivism rates since 2018 are any indication. (Sweden and Norway are wondering what took the U.S. so long to figure this out)

Against this positive backdrop, the tyrannical abuses and restrictions imposed by this SOE are akin to a self-righteous but retarded salmon swimming all alone in the wrong direction against the current of all the other fishes. And, frighteningly, she does not appear to be aware that she is alone. Furthermore, while the SOE occupies herself with arbitrary "policy" making and Gestapoesque enforcement of her restrictions while under severe staff shortages, the FCI-Seagoville Edumacation (sic) Center has not and does not offer any college classes although it has plans to offer a vocational class in 2024 for those interested in trade school. For everybody else it is a barren wasteland of unused potential and abuses.

How is it, you might be asking, that YOU have typed this essay if this tyranny is as omnipotent and prevalent as YOU say that it is? That is a fair but anticipated question. After being selected by the Associate Warden to be the editor of a new incarcerated military veterans' newsletter (The Bars & Stripes), the SOE refused to allow me to use the Education Center's typewriters to create the newsletter (I have since published seven editions) so, the local facility administration assigned me a BOP typewriter for my room against the vehement and emotional protestations from the SOE. (I am the only inmate at this facility with a typewriter but there used to be a typewriter in every housing unit until this SOE recently removed them) The SOE's stated reason for denying my use of "her" typewriters to type the newsletter in the first place was [QUOTE], "If I let you use the typewriters for that then I will have to allow everyone to use them for non-legal typing and then they will start writing the newspapers." (Referring to the outside news organizations)

Not only is her distorted reasoning an improper motive, it is nonsensical in that nothing could be more impactful to the outside newspapers than for us to be reduced to writing on napkins with crayons in order to communicate these abuses. I can only imagine how awesomely urgent the words "Please help us!" would look scrawled in bright red on a napkin. Her restrictions do not prevent this communication. They, in fact, encourage it, hence, the energy and expense I have put into this essay. Simply put, there is no penalogical or official BOP policy or other justification for these unreasonable humiliations and restrictions that are preventing inmates from timely creating and filing federal and state civil, criminal and tax court obligations and also preventing the creation and duplication of presentable non-legal literary works that are described and encouraged in BOP P.S. 5350.27 which has been in effect since 1999 and states that inmates do not have to have BOP staff approval of these non-legal creations. Furthermore, the inmates pay for these creations through photocopy cards and typewriter ribbons.

Having said all of that, I must disclose that I am privy to the SOE's sensitivity to what is written in the press about her and her Education Center because one of my op-ed pieces came to her attention when it was published online by the Vanguard Incarcerated Press (davisvanguard.org) and others in May, 2023. It was titled "BOP Offers Higher 'Degrees'" and described the lack of education offerings at FCI-Seag-oville but then went on to tout the intensity of the "Degree Program" that I was immersed into when I was put into a housing unit of 180 men with NO AIR-CONDITIONING and only five functioning showers...in Texas! To see just how intense that degree program was, simply Google the 2023 Texas summer temperature history which set records in both temps and consecutive duration.

So, yes, I have a typewriter on which I am able to create the Bars & Stripes news-letter as well as my legal and non-legal literary works.

As an absurdist humorist and non-fiction writer, I write with the idea of not only sharing my experiences, views and humor with the outside world while I am incarcerated, but also with an eye toward eventually publishing them in a collective volume. This is a BOP authorized productive activity and it is totally reasonable that I will want to produce them in a presentable form especially for the purpose of the copyright application process.

I also have several civil cases in federal court and before the US Tax Court in which I am acting pro se (representing myself) and which require timely, presentable and readable court filings. I am also engaged in a paralegal certification correspondence course which requires that I create presentable and readable lesson work and, due to caution and commonsense, that I photocopy my open book test sheets and course work before I send them through the mail to the school for credit. On this point, it is interesting that the SOE had recently informed me that she could write me a disciplinary for my having signed up for the correspondence course without first seeking her permission. That's right! For my having had the audacity to take it upon myself to pay for and import my own educational curriculum into this barren educational wasteland, this woman threatened to sully my sterling six year history of good behavior! At least she has priorities.

We could learn a lot from Norway and Sweden in how to better rehabilitate and treat the incarcerated and it is in the interest of the community that we do so as most inmates will ultimately be released back into the community. What kind of released would you like to move in next door to you? It is probably safe to say that you would strongly prefer someone who had not been simply warehoused for years while being arbitrarily deprived of basic growth opportunities by overlords that inhale, savor and wallow in their artificial power like high grade catnip.

There is a prolific group of incarcerated writers at this facility with some having previously had press credentials. Collectively, we, as a group of similarly concerned and affected inmates, recently began a concerted effort to obtain relief from these abuses. This effort included a writing campaign to the Office of the Inspector General, the DOJ Civil Rights Litigation Div., the BOP South Central Regional Office, BP-9 Grievances filed with the Warden's office and Tort Claims filed with the regional office claiming purchased photocopy cards that were rendered useless by the SOE's "policies" restricting the use of the copy machine that were enacted without notice.

So far, these efforts have generated nothing more than a continuous chorus of crescendoing cricket chirps. However, we fully intend to exhaust the rest of the available administrative remedies as per the PLRA so that we can petition the federal court for an injunction if all of our other efforts fail to gain relief.

It never fails to amaze and nauseate me that when the volume of Lee Greenwood is cranked to maximum, the patriotic crowds are unquestioningly moved to subjective tears and the blowing of snot bubbles as they mindlessly mumble along to the high fructose lyrics that hypnotize them into believing that they live in a land that is free from tyranny. But for many of the incarcerated, there is a contradiction that is as blatant as 4th of July festivities at Abu Ghraib. (Nothing to see here, folks. Please move along.)

Randall Morris FCI-Seagoville, Texas 10/22/2023

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Randall Morris
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BOP OFFERS HIGHER "DEGREES"

FCI Seagoville is a low security federal facility located fifteen miles Southeast of downtown Dallas, Texas, with an inmate population of circa 1,800. I arrived here on 3/2/2023 to serve a 19.5 year sentence, five of which have already been served in county jail awaiting my sentence and transfer to the federal Bureau of Prisons. The 2020 outbreak of Covid-19 in the U.S. and the subsequent closures of the courts and prisons in response to the pandemic were the reasons for my unusual and extreme duration in the county jail.

After serving those five years of what many, to include judges, consider to be county jail "hard time", I had looked forward to finally transferring to the BOP where the living conditions and educational opportunities are rumored to be vastly better than most state prisons and exponentially better than the extremely uncomfortable county jails that do not offer education programs.

The expectation that one can further one's education in the BOP was further propagated through the wording of the 2018 First Step Act and the 2021 availability of the Pell Grant to inmates which had been unavailable to the incarcerated since the 1990s.

Simply put, after wasting away for five years in a county jail which had me locked in a small cell for 23 hours per day - every day - and with no access to reading materials, I was more than ready to transfer to the BOP and to begin furthering my education through college courses from schools that have partnered with the BOP. I had imagined filling my days and evenings with study in order to better myself for my eventual release back into society and to use my advanced education to help overcome my felony record when seeking employment.

It should not be difficult then to imagine the disappointment in discovering that FCI Seagoville does not offer college courses despite its large population, despite the First Step Act and Pell Grant for inmates and depite the formidable size of the so called FCI Seagoville "Education Center" building with its numerous empty first and second floor classrooms that depressingly echo the building's original architectural intent and wasted potential when you enter and call out, "Hello, is anybody here?" (cue the tumbleweed and crickets).

For inmates that independently seek them out, there are some alternatives through distance learning correspondence courses from colleges like Adams State University, University of Idaho, Upper Iowa University and California Coast University to name just a few of many. However, costs per credit hour range from \$160 to \$500 making them unaffordable for most inmates considering that the typical federal inmate prison job pays only \$20 to \$60 per month and that is before federal taxes are deducted. Worse yet, the majority of federal inmates remain unemployed because there are not enough prison jobs.

The 2018 First Step Act's stated goal is to reduce the number of federal inmates and to reduce recidivism through programs and education provided by the BOP. Currently, the only "education" offered at FCI Seagoville are GED and sporadic non-accredited self betterment classes that do not require textbooks or controlled testing and that are taught by other inmates. These courses have no tangible market or transfer value. Worse yet, the capacity of these classes is only twenty-five inmates and as there are so few of them sporadically scheduled, they fill up as soon as they are announced causing weeks and sometimes months of waiting to participate in these token classes.

Why so few classes and where are the community colleges and universities? One might point out that fewer inmates will eventually result in smaller BOP budgets and staff reductions which will mean BOP suicide if the provisions or mandates of the First Step Act are fully and robustly implemented at each federal prison. If the wardens control this implementation it would appear to be a direct conflict of interest.

So, what about the new Pell Grant for Inamtes? Can't it be used to fill the BOP education void and allow inmates to select qualified college correspondence courses which could meet the programming aspect of the First Step Act?

In response to this question, a number of the colleges offering these correspondance courses responded that the new Pell Grant for inmates can only be applied to qualified courses that are physically taught by a college at the prison facility. However, two others responded that the federal rules governing the application of the Pell Grant for inmates are still unclear. And when FCI Seagoville staff were asked, they did not know and were unable to help. The collective end result is that the Pell Grant for inmates is currently useless to the 1,800 inmates at FCI Seagoville if not most or even all of the inmates in the BOP.

Having said all of this, I must now confess that it is not entirely true that FCI Seagoville does not offer an intensive degree program of sorts. It is true that, in fact, I was exposed to higher degrees upon my arrival when I was assigned housing in a barrack of 180 men with no air conditioning and only five functioning showers. Google search "Texas Summer Temperatures" to confirm just how intense this degree program is. (cue the search engine pop up air conditioning ads).

With another summer just weeks away many inmates are apocalyptic in describing their experiences with the brutality of the heat and humidity of past Texas summers in these barracks and liken it to a perpetual involuntary Swedish Sauna stoked to maximum. But to be fair, FCI Seagoville is somewhat merciful in that they do issue small cheap plastic fans but only to those inmates that can afford them at \$30 each. No money? No relief for you! Next!

On 4/6/23, the Dallas Morning News (Vol. 174, No. 188) headlined an article by Lauren McGaughy titled "Danger By Degrees". That article could have also been titled, "Torture, Death and Murder By Degrees" as it reported that "Seven in Ten [Texas] state—run lockups lack universal air conditioning" & that "The lack of climate control contributed to the deaths of at least twenty—three inmates between 1998 and 2012". Even though Texas is one of thirteen states that does not require air conditioning inside state jails and prisons, Texas has been repeatedly sued over living conditions and is currently fighting twenty lawsuites related to extreme heat in its prisons. The article further reported that "in 2017, the

state was ordered by a state judge to install air conditioning in the Wallace Pack Unit where elderly and sick inmates are housed. Installing it cost \$4 million. Fighting the lawsuit cost \$7 million". The article concluded with the prospect of several bills that are currently before the Texas House that would require temperature control in all state-run jails and prisons if passed.

As this Dallas Morning News article did not mention the lack of air conditioning in the federal prisons within Texas, I felt compelled to write about it. Now that it is done, I am sending it to the Dallas Morning News, Prison Legal News and others in the hope that there will be more attention and reporting on these living conditions, lack of education and the impotence of the federal Pell Grants for inmates.

As a disabled veteran it is sad for me to admit that sometimes when I watch the large U.S. flag wave in the Texas wind outside my barrack window within this punative federal prison, I often find myself thinking about and envious of Sweden with its highly successful rehabilitative and redemptive prison system, its emphasis on inmate education, its campus-like prison living conditions and its merciful automatic expungement of felony records after seven years of prison release with no recidivism.

Sweden is also renowned for its saunas. The difference there is that Sweden does not warehouse its citizens in them.

Randall Morris

4/26/2023

by Randall Morris

It is a sunny and warm spring day in late March with a gentle Texas breeze rustling the Stars & Stripes and POW flag in the courtyard of the VIC's (Veterans—in—Custody) special housing unit at FCI—Seagoville. A male grackle performs his loud mating ritual with a sense of dire urgency as the female within his crosshairs of desire ignores his spectacle, opting, instead, to fruitlessly forage for insects in the green Astro Turf® under a picnic table in this, otherwise, tranquil courtyard. Within these details lies a rare prison privilege that is reserved for a specific group of inmates for whom this space was recently created to serve. More specifically, this space is reserved for those who have served.

Today, this peaceful federal prison courtyard radiates with life thanks to the support of the new warden, Dr. Grant, who, being a military veteran, herself, delighted in the potential of this space to the extent that she personally provided floral seeds for the beautification of it. And thanks to the arthritic green thumbs of the VIC's Greenhouse Committee — who paternally plant and nurture this space — the VIC's courtyard now presents it's first sprouts of sunflower, hollyhock, canna lilly and purple heart stalks breaking through the watered topsoil, which, itself, had been hauled in and carefully layered by geriatric VIC labor into the beds from which this germinating symphony now strains to protrude. This courtyard has become a place of purpose through labor, and for contemplation and solace.

For some, contemplation often leads to thoughts of loss, regret and remorse. Those with long sentences experience "ambiguous loss" — a clinical term for the perpetual grief and unfulfilled closure that stems from not being able to attend the funerals of lost loved ones. Others suffer from the memories of past traumas. And then, there is the common melancholy that comes from the often heightened sense of lost time which is usually accompanied by the fear that the world is passing one by.

The VIC's countyard is a safe sanctuary that allows incarcerated military veterans to work through these feelings, which might include struggles with equilibrium, without a prison audience or distraction. It also allows VICs to be in close proximity to other VICs who better understand them.

Lynn Dwayne Rayl was an incarcerated Air Force veteran from Missouri who honorably served his country from 1965 to 1973, which included a tour in Vietnam. Confined to a wheelchair, he became totally blind and helpless at FCI-Seagoville in 2022, and he became one of the first VICs to move into the new VIC's Housing Unit at this institution in June 2023. And, as the medical department had not assigned him an inmate caretaker since he had become wheelchair bound and blind, fellow VIC Bill Walsh volunteered and took round-the-clock care of him for several weeks after Mr. Rayl was moved into the VIC's housing unit.

Two days after Mr. Rayl's arrival in the unit, I overheard him complain that his toenails were causing him pain because the medical department had failed to cut his toenails for the previous eighteen months despite his repeated trips to sick call requesting assistance. Due to his discomfort, I wheeled him to sick call and requested that his toenails be attended to just to be told that they didn't have time and that we should come back some other time.

Unwilling to accept this brush-off and oblivious to the extreme fortitude that would be required for the task that I was about to volunteer for, I naively offered to cut his toenails, myself, if the nurse would provide the clippers and a space for me to perform the procedure. Surprisingly, she agreed and provided me with industrial-grade clippers that could have doubled as botanical pruning sheers and a space beside her desk to cut, what would shortly reveal themselves to be, the most prehistoric and gnarled set of toenails ever to have existed outside of a Ripley's "Believe It or Not" exhibit.

However, a bit of poetic justice for Mr. Rayl was achieved when, while I was applying extreme torque and straining to cut the first gnarly toenail from his big toe, a thick chunk of crusty toenail resembling a deep fried pork rind snapped off and arced through the air following a strategic trajectory that brought it precisely down onto the computer

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keyboard on the nurse's desk causing her to reflexively push back in her office chair while yelping, "Ew! Oh my god, ew!".

This was only the beginning. The neglected toenails were so thick that the cutting of each one resulted in them snapping off and flying in different directions causing the medical staff to flinch and dodge to avoid being hit. It was like a carnival shooting gallery with the targets being the medical staff wearing worried looks as they tried to anticipate where the next SCUD missle would land.

As Mr. Rayl was not able to visually enjoy the carnage that his ballistic toe grunge was inflicting, I narrated the exhiliarating details to him in real time and hushed voice which caused a half-smile of satisfaction to spread across his face. This is the only known and documented smile that he had ever exhibited at FCI-Seagoville.

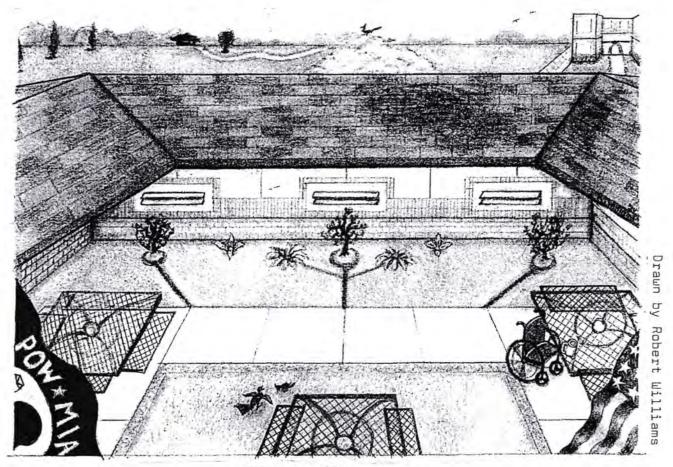
But despite the round-the-clock assistance from his fellow VICs, Mr. Rayl fell and broke his hip in July 2023, which resulted in his immediate transfer to a nearby Federal Bureau of Prisons medical facility and from which he would not return.

Born in 1944, SSGT Lynn Dwayne Rayl passed away on January 1, 2024, without having had the opportunity to see or to enjoy the VIC's courtyard, which now has wheelchair accommodating picnic tables. He was 79 years old.

He was, however, the first incarcerated military veteran at FCI-Seagoville to be collectively cared for by his fellow VICs within the new VIC's housing unit.

The architect of the VIC's program and housing unit, Associate Warden Aaron Greenfield, introduced a motion to formally dedicate the VIC's courtyard as the "Rayl Yard" during the VIC's assembly meeting on March 28, 2024. The motion carried unanimously.

Welcome to the Rayl Yard



FCI-Seagoville, Texas

Good Morning, Sweetheart!

I think that we all agree that nobody wants to read the details about a guy who found love at 51 years of age. Who cares? I mean, what could possibly be interesting about that?

After my divorce from my first and only wife in 1995 when I was twenty-nine, I was happy as a bachelor for the next 21 years. And, turning fifty had not been a big deal. In fact, I had nonchalantly celebrated it alone with a six-pack of Hefeweizen while returning to my home in Arkansas from a business trip to Dallas on March 29, 2016.

Nope. There had been no mid-life crisis either but I was beginning to feel an ever increasing desire to find someone to share life and to go on AARP discount cruises with.

Being a moderate liberal, I knew that my prospects would be extremely slim in Arkansas where I had been unsuccessfully trying to get in touch with my "inner Bubba" for eight years, but I had nothing to lose in trying and I had a cost effective (cheap) method in mind through which I would ferret her out from wherever she may be hiding.

So, with great excitement and anticipation, I created an advertisement and uploaded a few of my best pictures under "Men Seeking Women" and "Casual Connections" on Craigs-list. Once the submission was done, I sat back in my office chair and thought, "Here I am. Now, come and get me ladies."

In retrospect, nothing could have prepared me for the torrent that I unwittingly unleashed when I clicked that "submit" button. I was almost immediately inundated with lewd and lascivious messages containing nudes and propositions from every sexual identification and orientation to include straight, gay, bi, baptist, trans, drag, omni, pan, nonbinary, linear, obtuse, obsequious and perpendicular - just to name a few.

After a week of this, I did receive one seemingly decent Craigslist response from a woman who claimed to work as a chemist in a FDA laboratory. And after several weeks of telephoning and texting, we decided that it was time to meet but she insisted that we meet at her house. I wanted to take her out but no matter what I proposed, she remained adament that we meet and remain at her home for our date so, we agreed that I would bring the ingredients for my special chili and we would cook and eat together at her place.

Later that evening, I was at the front door of a fairly nice house and I had just pressed the doorbell when the door opened and I was face to face with a smiling woman whom I did not recognize. When I asked to speak to Maria, she smiled wider and said, "Randy, I am Maria." At this point it became immediately and brutally clear that she had used an old picture depicting a much younger and slimmer version of herself in her Craigslist response to bait me in, but the real deal-breaker was the ankle monitor that I noticed peeking out from under her pant leg when I looked down trying to figure out the least hurtful way to terminate this date.

We ended up drinking the industrial-sized bottle of wine that I had brought before I developed enough liquid courage to lay out the truth of my displeasure of having been tricked and bolted for the door, thus, bringing this date to an abrupt and merciful end with the efficiency of a guillotine. And with that, I shut down my Craiglist campaign and moved my love search over to Plenty of Fish ("POF").

POF seemed more safe and discerning and it gave me the option to select the age range of females I am interested in so I created a profile, uploaded my best pics, selected ages 38 to 48 and submitted it all for POF approval. And as I waited for it to go live, I sat back and thought, "You're very welcome, ladies! Now come get it before this is

snapped up!"

I will never forget receiving my first POF email notification that same evening informing me that my POF dating profile had received a "wink wink" from POF unsername "Possum Catcher". I was totally expecting to see a picture of some dude as I clicked the email link but I was brought, instead, to the POF profile picture of a stocky female in blue jean shorts, wearing a racoon tail cap and proudly holding up a possum in the air by it's tail.

The first red flag was that she was from Mena, Arkansas, which is in a very remote, rural and religious dry county. Second, it wasn't clear whether the possum in the pic was alive or dead but that really didn't matter as I was looking for someone to share life with, not my spittoon. And third, most people choose their best pics for their online dating profile so if that was the best... sorry, gotta run.

Over the next few weeks, I received messages and "wink winks" from thirty or so women who were <u>all</u> 60 to 75 years old despite my having set the age preference to "38 to 48". And every time I checked my POF message inbox, it was like "standing room only" in an assisted living center in there. I mean, in one of the responder's pics you could clearly see oxygen tubes in the woman's nostrils! I thought, "Good God! What's next? An invitation to her hospice for coffee?"

In an honest attempt to fix this, I updated the text of my POF profile to clearly state that I am only interested in women from 38 to 48 and that anyone older than that should not wink or send me messages.

The baring and gnashing of angry dentures was immediate as this geriatric pride of cougars pelted me with rabid messages calling me "superficial" and a "troll". I could even imagine them yelling "troll" in a raspy Virginia Slims cigarette voice that's been honed from years of shouting "bingo" on Saturday nights at the VFW. I took this for a few weeks but it became too abusive so I closed my POF account. Good riddance. But now, every time I see an ad for POF, OurTime.com or Polygrip, I instinctively flinch and shudder. Even the electric whir of a Rascal Scooter® passing behind me while shopping at Wal-Mart could cause me to tense up and become hyper aware.

They say that most people find love when they aren't looking for it. I was sitting in my office one day doing just fine by myself and making liberal comments on my conservative friends' Facebook posts when she suddenly appeared with a "like" on one of my snarky comments. She was 39, intelligent and wonderfully beautiful and after a year developing an online/telephone relationship with her, we decided to meet for the first time on a weekend. The plan was that I would drive the eight hours from Arkansas to where she lived in Alcoa, Tennessee and I would check into a local motel.

Shortly after I had arrived and checked into the motel, I picked Jamie up and took her to dinner in downtown Knoxville. Afterwards, we went back to my motel room for a few drinks before I drove her home for the night and returned to my motel room. Since we were both late morning sleepers and we had discovered that my cell phone had poor reception in my motel room, Jamie had suggested that she would call the landline phone in my room in the morning when she wakes up to wake me up so that we could spend the day together before my drive back to Arkansas that evening. I thought that her plan was perfect just as she was perfect and, with that, I returned to my motel room and went to sleep wearing a goofy smile of amorous bliss.

The sound was offensive and brutal. It was like someone was urgently beating a metal skillet next to my head. As I came to, I was scowling with irritation from the rude noise until I realized that the sound was my newly minted sweetheart with the promised wake up call on the landline. This realization was like a euphoric injection of morphine that caused me to pick up the clunky phone receiver, make up some fake French and

deliver it to her through the phone in a ridiculously breathy and seductive French accent.

"Merci beacoup, c'est la vie. Je et toi, mon cherie!"

(Which, if generously interpreted, means something intense and sexy like...
"Thank you, that's life. You and me, baby!")

After an embarrassingly awkward silence during which I became convinced that I had just committed social and romantic suicide, a guy with a notably authentic sounding Indian accent soberly responded, "I must remind you that the check-out is at 11 o'clock." Now, I might be going out on a limb here but I am fairly certain that his accent was real and that his name was probably a Mr. "Patel" because A) I had overslept in the $\frac{\text{(insert any motel name here)}}{\text{(insert any motel name here)}}$, and B) his intonation sounded as if he had taken a dip of snuff, hadn't spit in a while and was holding his chin up so as not to dribble while he gargled out the words.

It was interesting that when I later recounted this telephone interaction to Jamie, she thought that while the story was hilarious, the French words and accent didn't really have my desired effect on her. However, she later learned that I speak fluent German and after I had provided her with a German sample at her request and in a strict German accent, her eyes grew wide and she perked up with, "Oh my God! That was so hot! Say that again," after which she continued to have me say it and other German phrases the rest of the day. (Strange girl) This discovery had me wondering if there is anything else that I might need to know about her before we start making life plans together.

Unfortunately, Jamie and I pleasantly parted ways a couple of years later and today I am a bachelor in a federal prison writing true stories. As such, this story was not really about finding love after fifty. It was about mining memories for what, at least for me, are the uncommonly funny and ironic occurrences in my life that beg to be told without the full weight of the context in which they happen. As an absurdist humorist who absolutely hates fiction, it is my passion and joy to extract, refine and present the funny and absurd. Otherwise, nobody would really care to endure the details of a guy over fifty finding love, right?

Randall Morris 5/19/2023

Seagoville, Texas

"If my life weren't funny, it would just be true, and that would be unacceptable. -Carrie Fisher

"The saving grace of humor is that if you fail, at least you don't have anyone laughing at you." -A. Whitney Brown

"The wise man can pick up a grain of sand and envision a whole universe. But the stupid man will just lay down on some seaweed and roll around until he's completely draped in it. Then he'll stand up and go, 'Hey! I'm Vine Man!'" -Deep Thoughts by Jack Handey

"The names have been changed to protect the stupid" was all that it took to draw a rebuke and an unexplained rejection from the Prison Journalism Project (PJP) of my Personal Essay titled "Charged with murder in Arkansas? Hire a part-time defense attorney!". To ensure a robust and complete defense against such a dire criminal charge in a notoriously callous, death penalty-loving state, the essay title illogically suggests the hiring of a part-time attorney, who, the essay went on to reveal, moonlights as a raving disc jockey whose stage name is "DJ Spooky Tooth". (Think about that. Take all the time that you need.)

I'll bet you are sitting there thinking, "Well, that would be just plain stupid!", and, you would be correct, except that the story was true and had played out in an Arkansas county jail.

After complaining to me that his defense attorney had not once visited him in jail since his arrest and since he had been paid \$15k to represent him against a murder charge, "Chris" (not his real name) told me the name of his delinquent attorney (whose name I had also changed within the rejected essay), after which I had responded:

[Excerpt from the rejected essay]

"'I have never heard of your attorney. Is he local?' At this, Chris perked up, puffed out his chest and advised me that, 'Actually, he is pretty well known around here because he is also a DJ. Goes by the name of DJ Spooky Tooth.' While Chris seemed to be tremendously impressed with that dubious credential, the revelation had the opposite effect on me as I suddenly caught ominous visions of future Chris strapped to a gurney with prison officials probing his arms for a suitable vein while asking him for any last words.' "

Needless to say, it is highly improbable that either the defendant or his DJ attorney would ever agree to being named in an essay spotlighting the absurdity of their relationship even if I could somehow locate them from the federal prison in which I am presently serving time and, assuming that Chris has not yet been involuntarily dispatched home to Jesus by the Arkansas Department of Corrections. But the fact remains that this true story begged to be told by an absurdist humorist, like me, so, I changed the names so that the humor of it could be harvested and told without harming anyone, and, as part of that humor, I had inserted the phrase that I had changed the names to protect the "stupid", which swiftly triggered the wrath of the folks at the Party Pooper Journalism Project (PJP).

The choice of the word "stupid" in a humorous personal essay (not a NY Times front page article) that did not actually name anyone was contextually permissable and structurally desirable because the word choice reinforced the inherent /root humor, which was the point of the story, and the placement of the word in an unexpected location was humoristic technique. Furthermore, it was necessary to state that the names in the story had been changed but it would not have been accurate (or funny) to have declared that the names had been changed to protect the "innocent" as the defendant had not yet gone to trial.

Like a squirrel trying to find a nut graf (lame journalistic pun), the rejection of my essay without elaboration has caused me to doubt that I had violated any journalism industry standards governing personal essays and I now deeply suspect that I may have been guilty of nothing more than offending someone's personal preference or their subjective sensibility.

In other words, my personal essay has been the victim of improper censorship by the Prudish Journalism Project (PJP).

I am a huge fan of absurdist humor newspaper columnists like Rex Huppke of USA Today, Dave Barry of the Miami Herald, Tony Kornheiser of the Tampa Tribune, Jason Gay of the Wall Street Journal as well as absurdist humor television news shows like The Daily Show with Jon Stewart and Last Week Tonight with John Oliver. But despite that most major (and many minor) newspapers across the country have at least one humor columnist and lampooning political cartoonists, Pyongyang Journalism Project's (PJP) Central Scrutinizing Committee rejected my excellent essay because of a word and then smugly doubled-down on it by pointing me to the door when I questioned the rejection.

In their August 9, 2024 response to a letter I had sent grieving the rejection, Persnickety Journalism Project (PJP) dispatched this pithy edict: "Your understanding of journalism differs greatly from the industry standards at Prison Journalism Project." Although this response was not informative as to what the "industry standard" is with regards to personal essays or specifically how my essay offended that standard, it was not very offensive as I was wearing my big boy boxers that day (the ones with the "Tippy the Wonder Poodle" print) and, I would rather use laxatives irresponsibly than to adhere to rigid, humorless, missionary position, Pyongyang-style journalism if that is what PJP is peddling.

However, the decree went on to priggishly advise that, "If you feel that your work does not align with our community agreements and journalistic standards, you may unenroll from our handbook certification course [A Prison Writer's Guide To Media Writing correspondence course]. We have a long waitlist of eager participants for our no-cost training."

That magnificently festooned slab of imperial boilerplate response was conspicuously self-righteous but loaded with subliminal professional journalism school tips and techniques if you were paying close attention.

First, without offering any specifics regarding the rejection of my essay, it stealthily weaponized the, otherwise, innocuous word "unenroll" in a brilliant passive aggressive maneuver that, to a weaker journalism student, would have upset the heretofore perceived faculty/student relationship and effectively quashed any further inquiry out of fear (which was seemingly the intent).

But the part of PJP's written response that would have made Joseph Pulitzer's pince-nez fall from the bridge of his nose in suspended bewilderment was when Pomposity Journalism Project (PJP) actually attempted to use charity shaming to shut down further discussion and then, double-dipped with a linguistic turn of the table to make it sound as though I might feel that my work does not align with their standards, which is preposterous because, not least of all, PJP has failed to divulge the specific standard that I had supposedly not aligned with.

According to the Mirriam-Webster Dictionary, censorship is "the action of a censor esp. in stopping the transmission or publication of matter considered objectionable." It defines objectionable as "undesirable, offensive".

In the absence of a clear rule that states that using the word "stupid" in a personal essay is offensive (particularly in a humorist essay), it is safe to say that whoever is assessing the work for offensiveness must do so objectively, which Mirriam-Webster defines as "treating or dealing with facts without distortion by personal feelings or prejudices."

Literary works and words must be considered within context, otherwise the assessment is subjective and can result in prejudicial censorship. Most journalism schools and media organizations bristle at the mere mention of unqualified or arbitrary censorship. PJP's failure to properly render a scholastic response to my letter questioning the rejection of my essay hurts its integrity and leaves me no choice but to conclude that my work had been subjectively censored.

After a review of my issue and supporting documents (which included the rejected essay), incarcerated military veteran, Robert Williams, 51, had this to say:

"As a Society for Professional Journalists Award winner, not once during my time as a student serving my collegiate newspaper or as a staff reporter for a local newspaper, have I ever been subjected to an arbitrary dismissal of my work. Any question of my work was always handled respectfully, almost paternally, through an inclusive review process with clearly articulated ground rules devoid of emotion. That, in my opinion, is what good journalism instruction should look like."

Upon my arrival at FCI-Seagoville, a low security federal prison in Texas, to serve my sentence, I immediately experienced two deprivations that had been plaguing the inmates here for years; the total lack of education offerings and the lack of air-conditioning in some of the housing units (I was placed into one of them). As an accomplished practitioner of protest humor, I composed a protest essay titled "BOP Offers Higher 'Degrees'", which allowed me to cleverly expose the lack of education and then twist the narrative to address the lack of air-conditioning by couching it as an immersion into an intensive "Degree Program" that I was placed into when I was involuntarily assigned to a housing unit of 180 men with no air-conditioning and only five functioning showers... in Texas! To see just how intense this ongoing degree program is, simply Google Texas summer temperature history. Update: I am currently finishing up my postdoctorates in Thermoduric Lifestyles and Epidermic Fusion.

I, then, followed that up with an essay titled "Paying For Much More Than Our Life's Mistakes" which railed against arbitrary deprivations of the inmate photocopy machine and typewriters and humorously skewered the tyrant staff member who had imposed these deprivations.

The backstory was that this staff member was imposing a restriction that only legal work could be typed or photocopied because [Quote], "If I allow everybody to type or copy other documents, they will engage in writing the newspapers." (Meaning outside news organizations) This tyrant went on to declare that all non-legal work can be done by hand. But, what she wasn't considering was that, for some, like me, such deprivations that violate inmate rights (i.e., BOP Program Statement 5350.27, authorizing and governing inmate manuscripts), would, in fact, encourage contact to the outside media and inmate rights orgs. Simply put, nothing could be more impactful than being reduced to scrawling "Please Help Us!" in crayon on a napkin. But that logic is lost on some of these carceral bullies who overtly enjoy to inhale, savor and wallow in their artificial power like high-grade catnip.

After staff members discovered both of the above essays published on the Vanguard Incarcerated Press at Berkeley (davisvanguard.org), I became the target of retaliation and my response to it was to clandestinely type and send out even more of these humourous eviscerations for online publication until the retaliation finally subsided. Why did I do that? Because retaliation is terroristic censorship, which must be exposed at all cost. Instead of the word "stupid", most of the above essays refer to the retaliatory staff as "tyrants" and "tyrannical" but refrain from actually naming the staff. What does PJP say? Was calling them tyrants within a personal prison protest essay objectionable or in violation of some ambiguous journalism industry standard?

I had signed up for PJP's journalsim course to become a better writer after I had been arbitrarily chosen by an associate warden to be the editor-in-chief of a new inmate produced newsletter despite that I had no journalistic credentials or experience. The newsletter has published 15 monthly issues to date and is extremely rare as it is the only known inmate produced newsletter within the entire 122 prison federal Bureau of Prisons (BOP) system. In fact, according to a June 15, 2023 study released by the Prison Policy Iniative titled "Breaking news from the inside: How prisons suppress journalism", the BOP has an "explicit ban" on prison journalism. But although we (the Seagoville Bars & Stripes staff writers) have been unable to find an actual BOP policy that articulates such a ban,

the rarity of BOP inmate newsletters compared to the explosive proliferation and support of state prison newsletters across the country suggests that there might be a defacto ban, or, at the very least, an active discouragement of inmate newsletters by the BOP. The rarity of our newsletter provides me with additional motivation to earn the PJP journalism certification.

However, in addition to the, still, unanswered questions regarding the rejection of my personal essay, PJP's written response was curt, snippy, passive aggressive and offensively dismissive. In fact, it made me feel like I had asked the "Soup Nazi" character on the TV show, Seinfeld, for his secret soup recipe - "No soup for you! Now get out! Next!". The unanswered question, though, still remains: Did my personal essay word choice offend an actual industry rule/standard or, did it merely offend PJP?

"Vague rejections mask the very real potential for improper censorship and should never stand unchallenged for more information regarding the basis," advises Sergio Hernandez-Colón, 36, a fellow incarcerated military veteran who prides himself in being a self-described revolutionary socialist with a deep distrust of unchecked power that is partly derived from his first-hand experience of the colonization of Puerto Rico, his native country.

Thomas Jewell, 67, an inmate and former educator for 30 years with a stint as an english lecturer at San Jose State University, poetically added, "Censorship, more often than not, creates an obstacle rather than a passageway to the truth."

Is PJP objective? That question will be answered in how PJP chooses to treat this Reported Essay, which is being submitted as part of my required course work for PJP's journalism course. See what I've done here? I have economically litigated the censorship of my personal essay while using that litagation as subject matter for my reported essay. And, I have strategically placed the word "stupid" throughout this essay. (It appears five times on the first page alone.)

But, all humor aside, there is absolutely nothing funny about improper subjective censor-ship.

Randall Morris

9/9/2024

FCI-Seagoville, Texas

[In the spirit of fairness, a good faith attempt was made to include at least one opposite viewpoint but, fortunately, nobody with a pro-censorship opinion could be found]

Prison Journalism Project 490 43rd Street, #360 Oakland, CA 94609

Case 3:24-cv-03148-X-BW

Randall Morris, #15141-010 FCI Seagoville Federal Correctional Institution PO Box 9000 Seagoville, TX 75159-9000



PP LEARNING

August 9, 2024

Re: absurdist humor journalism

Randall,

We have received your latest correspondence. Your understanding of journalism differs greatly from the industry standards we practice at Prison Journalism Project. If you feel that your work does not align with our community agreements and journalistic standards, you may unenroll from our handbook certification course. We have a long waitlist of eager participants for our no-cost training. Please let us know if you decide to withdraw.

If not, please resubmit your assignment following the guidelines.

Sincerely, PJP Learning

Please note: We have updated our mailing address to 490 43rd Street, #360 Oakland, CA 94609 (for all mail!)

You can add us on Corrlinks at wr-mail@prisonjournalismproject.org

Charged with murder in Arkansas? Hire a part-time defense attorney!

"Yo, yo! What's up? Attorney Britt Mueller here. Sorry, couldn't take your call but drop your info and Ima hit ya back. Book me now for your bad birthdays, dope bar mitzvahs, sick weddings and all night raves that slap! And hit me up bout my 'Molly'-day discounts! Ha, ha." [Beeeep]

This story is true but the names have been changed to protect the stupid and the exact location has been purposefully withheld.

Unexact Location: A county jail somewhere on Albert Pike Blvd in Hot Springs, Arkansas.

If I were "Chris", I would not want to be publicly identified by my real name in this story even though he was the one who told it to me with a straight face and matter-of-fact tone. And as for Chris's criminal defense attorney, I am not convinced of his competence to sue me so I am not afraid to publish this story with his name only slightly modified.

The skinny inmate in his late 20s with the bleached tipped spikey hair was staring at me from across the dayroom as I sat at a stainless steel table trying to read my book. As the new guy, I was still getting used to being scrutinized by the other inmates as they went about trying to determine whether I could be trusted. But his stare was becoming quite annoying so I intentionally looked up and caught it in a vice grip intending to stay locked on to it until he disengaged from the awkwardness.

Instead of looking away, he stood up and walked through the dayroom directly towards me. "Hey, my name is Chris. I live in 201," he said as he pointed up and behind me in the direction of his upstairs cell. And after exchanging the typical preliminary information that all inmates share upon first meeting, I asked him what he was in for and how much time he was facing. He looked at me for a moment as if to weigh how he should respond before asking, "You don't sound like you are from here so how long have you lived in Hot Springs?" to which I replied that I had been in town for several years. "Then, you probably saw my case on the news over the last few months because I am one of the five that was charged with conspiracy to commit the murder of that guy they found dumped in the cemetary last year."

"Wow!" I said. "I did see that on the news. They reported that the police suspect that it was a drug deal gone bad." "So they say," he exhaled. "And it doesn't help that my paid attorney is leaving me in the dark and won't take my calls." "Really? Who's your attorney?" I asked. "Britt Mueller. We paid him \$15,000 four months ago to take my case and he hasn't come to visit me yet and he doesn't answer his phone when I call," Chris sighed. "Guys in here get more responsiveness and representation from their appointed public pretenders than I am getting with a paid lawyer."

"I have never heard of your attorney. Is he local?" At this, Chris perked up, puffed out his chest and advised me that, "Actually, he is pretty well known here because he is also a DJ. Goes by the name of DJ Spooky Tooth." While Chris seemed to be tremendously impressed with that dubious credential, this revelation had the opposite effect on me as I suddenly caught an omnious vision of future Chris strapped to a gurney with Arkansas prison officials probing his arm for a suitable vein while asking him for any last words.

"Maybe he doesn't answer his phone because he sleeps late after his raving night gigs," I speculated. "Fifteen thousand is a lot of money to give to a lawyer who moonlights as a DJ, especially one with a stage name like that. And that kind of money could buy a really sweet sound system and light show. Perhaps he can't hear his phone ringing due to the noise in the club."

Chris shrugged and held out his albert fish for the customary fish butto that inmates use to signify that they are now considered friends before returning 1.6 his spat on the other side of the dayroom.

I don't know if Chris was quilty or innoment and I have beard mothing more regarding his criminal case as I was moved to an other product then as attitude country sail shouldy thereafter. However, I have often wandered when having a harpover and unprepared DJ lawyer might look like in the countroom.

Judget "Mr. Speaky Tacking how Seed your client glead?"

DU Spooky Topkhi "Yo, yo, yo, Tour Homen! We need to Gross those charges like I drop those teams. All the slenks in the Court let me hear ya say Eo! Dall yeah. Sease out!"

Randall Morris Seagoville, Texas

It's Over! France Surrenders! (Again)

In a bizarre move, France fully and unconditionally surrendered to tiny neighboring Luxembourg at 2:27pm Central European Time today. A press release sent to the Associated Press confirmed that in reaction to France's sudden surrender, the Luxembourg State Department immediately filed a formal complaint with the United Nations complaining that, "The situation is ridiculous because we have no military and we are not at war with France."

In response, France accused Luxembourg of being "a whiny little drama queen" for turning to the UN for what France sarcastically characterized as a ploy to cast itself as a victim in order to obtain an "emergency tiara" from the international community. France's vehement diatribe repeatedly drew comparisons of it's surrender to a woman offering herself to a man before going on to question Luxembourg's sexual orientation and virility.

Both countries are members of the European Union and have been at peace with each other for decades. This sudden act by France is so perplexing that several NATO member countries have speculated that France may have acted out of an irrational fear that it is slowly losing it's collective memory of how to effortlessly surrender, which is what it has always done for as long as the world can remember.

"This is quite true," says Parisian shop owner, Pierre Martineau, as he sits at an out-door cafe pursing his lips in contemplation of whether his Beaujolais is impish enough. "There was even a proposal once to make the white cloth dinner napkin our national flag, which would have been very practical because we like so much to sit while pursing our lips for hours in our cafes and restaurants so it would be very efficient to wave our white napkins patriotically on flag day or to use them to immediately surrender if we are threatened," he mused.

A high-level official within the French Ministry of Defense who was willing to speak under the condition of annonymity, was visibly irritated by the confused world reaction to his country's unprovoked capitulation. "It's our French heritage and military tradition," he insisted. "In fact, the first thing that we teach our officer cadets in our military academies is how to say 'I surrender' in German," after which he enthusiastically demonstrated by smartly coming to attention, throwing his hands up and pleading, "Ich gebe auf! Bitte nicht schiessen!" (I give up! Please don't shoot!)

The current French surrender has apparently triggered a ripple effect as the CIA is reporting that Quebec, Canada, as well as parts of Louisiana in the United States are exhibiting preliminary signs that they, too, will surrender if something is not quickly done to restore the courage and confidence of France.

Randall Morris FCI-Seagoville, TX

6/26/2023

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Exhibit I

Correspondence Courses



January 22, 2024

Randall Morris, #15141-010
FCI Seagoville Federal Correctional Institution
Box 9000
Seagoville, TX 75159-9000

RE: Learning Opportunity

We hope this letter finds you well.

Over the past 18 months, PJP has been creating a new way of teaching and learning the core competencies of journalism — A Prison Writer's Guide to Media Writing. This handbook is a practical training resource so writers can be published on PJP's online publication and beyond.

We are excited to send copies of the handbook to 200 writers in early 2024. We will invite more writers to join our second cohort in June 2024.

We are writing to share that you have been selected to join our initial PJP handbook cohort based on your previous work with PJP.

This handbook contains a three-stage learning progression. You will have the opportunity to complete the lessons in each stage and receive personalized feedback on your stories from journalism experts. PJP is also offering three certificates for each stage. The progression is self-paced and completed through correspondence.

Please respond by Feb. 12, 2024 confirming your spot in the cohort. If you are not able to join this round but want to begin with the next cohort, please let us know. If we don't hear from you, we will assume you are unable or uninterested in this opportunity.

Please follow the appropriate procedures for adding this book to your property list if you need to.

Sincerely, The PJP Team

P.S. If someone you know would like to join our next cohort, please have them write to us at our Delaware address. We cannot honor requests that aren't received directly from the individual themself.

Claymont, DE 19703

FP 9316787 155 1-1

Randall Morris, #15141-010

FCI Seagoville Federal Correctional Institution Box 9000 Seagoville, TX 75159-9000





RECEIPT

Order #:

HB2024-Co1-0155

Date:

March 18, 2024

Ship by:

March 27, 2024

Quantity	Item	ISBN	Cost
1	"A Prison Writer's Guide to Media Writing" By Yukari Kane and Shaheen Pasha	979-8-218-13841-7	\$35.00
1	PJP Writer Discount		-\$35.00
		Balance:	\$0.00

Please keep this slip for reference or to provide to your facility mailroom. Please add to your property list if that is required. Your book should arrive in 4 - 6 weeks.



Individualized Needs Plan - Program Review (Inmate Copy) Dept. of Justice / Federal Bureau of Prisons

SEQUENCE: 02307410

Team Date: 08-13-2024

Plan is for inmate: MORRIS, RANDALL ALLEN 15141-010

SEA SEAGOVILLE FCI Proj. Rel. Date: 04-09-2035 Facility:

Name: MORRIS, RANDALL ALLEN Proj. Rel. Mthd: GOOD CONDUCT TIME DNA Status: SEA11400 / 03-02-2023 Register No.: 15141-010

Age: 58

Date of Birth: 03-30-1966

Detainers

Detaining Agency Remarks

NO DETAINER

Inmate Photo ID Status

No Photo Id

Current Work Assignments

Facl	Assignment	Description	Start	
SFA	BDG 10 ORD	BLDG 10 ORDERLY	06-24-2024	

Current Education Information

Facl	Assignment	Description	Start	
SEA	ESL HAS	ENGLISH PROFICIENT	03-03-2023	
SEA	GED EARNED	GED EARNED IN BOP	08-23-2023	

Education Courses

SubFacl	Action	Description	Start	Stop
SEA		COLL CORRESPOND NON-INSTRUCT	05-20-2023	CURRENT
SEA		CREATIVE WRITING BASICS	08-01-2024	CURRENT
SEA	C	FSA WORK KEYS ADVANCED	09-11-2023	12-22-2023
SEA	C	CRIMINAL JUSTICE: THE FUNDAMEN	10-23-2023	12-04-2023 Dacks one
SEA	C	MANAGING A SMALL BUSINESS	10-24-2023	12-22-2023 12-04-2023 Blackstone 11-28-2023 Carer In
SEA	C	BEGINNING PENCIL ART CLASS/REC	07-08-2023	10-16-2023
SEA	C	HEALTH INFO AND WELL BEING CHK	09-20-2023	09-21-2023 Dan Pml C
SEA	C	BEGINNER SPANISH CLASS I	08-08-2023	09-21-2023 Para legal C
SEA	C	ENGLISH COMPOSITION & GRAMMAR	09-20-2023	09-20-2023 Corresponde
SEA	C	COMMUNICATION SKILLS	09-20-2023	09-20-2023
SEA	C	ADVANCED MATH	09-19-2023	09-19-2023
SEA	C	PARALEGAL/LEGAL ASSISTANT	09-19-2023	09-19-2023
SEA	C	SMALL BUSINESS ACCOUNTING	09-19-2023	09-19-2023
SEA	C	READING FOR SUCCESS	09-18-2023	09-18-2023
SEA	C	BASIC MATHEMATICS	07-17-2023	09-04-2023
SEA	C	FSA WORK KEYS ADVANCED	08-10-2023	08-30-2023
SEA	C	RELEASE PORTFOLIO	04-07-2023	08-25-2023
SEA	C	GED 2A 9:30-11:30 AM	07-12-2023	08-23-2023
SEA	C	FSA WORK KEYS	05-02-2023	08-10-2023
SEA	C	PUBLIC - PROFESSIONAL SPEAKING	05-11-2023	06-29-2023
SEA	C	STARTING A NON-PROFIT ORG.	05-08-2023	06-26-2023
SEA	C	EAT FOR HEALTH/FIT FOR LIFE 1	05-08-2023	05-15-2023
SEA	C	EFFECTIVE TIME MANAGMNT SKILLS	05-23-2023	06-01-2023
SEA	C	INTRODUCTION TO HOBBYCRAFT	03-21-2023	03-23-2023
SEA	C	COMMUNICATION SKILLS	03-20-2023	03-28-2023
SEA	C	ADMISSION AND ORIENTATION	03-09-2023	03-09-2023
SEA	C	RELEASE REQUIREMENTS 5	03-09-2023	03-09-2023

Discipline History (Last 6 months)

Hearing Date ** NO INCIDENT REPORTS FOUND IN LAST 6 MONTHS **

Prohibited Acts

Current Care Assignments

Assignment	Description	Start	
CARE1-MH	CARE1-MENTAL HEALTH	03-14-2023	

Welcome to College Guild! It's time for you to join our community of students!

College Guild is a nonprofit organization offering free, non-accredited general interest courses to prisoners. We have no religious or political affiliations.

Our mission is to encourage a life-long love of learning for its own sake. Our courses are not designed to prepare you to take accredited programs or impress a Parole Board.

College Guild courses are designed to be both thought-provoking and fun. They are written to be accessible to students who dropped out of school at an early age or for whom English is a second language. At the same time assignments are meant to challenge students with a strong educational background by encouraging creative, thoughtful answers.

The Process:

- 1. After receiving your application and course choices, we will send you Unit 1 of one of your top 3 picks. Courses range from 3 to 8 units long.
- 2. When you've completed and returned your written answers, your work will be sent to a volunteer (a "reader") who has 7 days to comment on your answers. There is no need to send the printed units back. You should keep them!
- 3. Reader comments will be sent back to you by mail along with your next unit. 4. After completing the last unit in a Course, you'll receive a Certificate of Completion and a course list so you can decide what to sign up for next.
- 5. You pay for your own paper, postage and envelopes.

Guidelines:

- Your reader is not a pen pal. You will only receive each other's first names. You may have different readers throughout the course.
- You can take as many courses as you want, but only one at a time. If you need extra time, you can always ask for an extension.
- Unless required by the prison, please write only your first name and last initial on your work and include the course name and unit # on the first page.
- If possible please use blue or black ink or dark pencil.
- Soft-cover dictionaries (from a bookstore) are the only books we provide. You can request a dictionary AFTER you complete your first unit.
- We can only help you with College Guild course units. We do not provide feedback on other work, manuscripts, or write letters on your behalf.
- Letters get lost in the mail write to tell us if you don't hear back within a month.

What Is It Like To Be A College Guild student?

We'd like to encourage you to consider a few things as you enroll in College Guild classes because we want you to have fun and enjoy learning with our courses...

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There are 3 kinds of people who enroll in College Guild courses... which one are you?

- 1. Someone who likes to learn but you don't think you are good at it
- 2. Someone who didn't like school, but you want to give it another try
- 3. Someone who likes to learn and gets excited about it

This letter is for all of you but especially if you're number 1 or 2. We want to encourage you to push past what holds you back and discover how much fun learning can be. If you're number 3, you're already confident and sure of your ability so go, do it.

<u>First off, getting mail can be pretty exciting</u> and we make sure your mail gets out as quickly as we can. When it arrives, and you open your first unit you might have mixed feelings. Happy, curious, confused and not sure what to do.

Even if you feel you've never really been good at learning, no matter what is going on around you, you can experience some control over your own destiny. You can experience a power and freedom that cannot be taken away by letting yourself become absorbed in learning, exploring and discovering the world through College Guild courses.

How to Tackle a College Guild Unit:

- 1. <u>There are no grades!</u> You can't get a failing grade! What you'll get back with a completed unit is feedback and encouragement from a real live person on the outside who will read your work and encourage you to keep going. The only way to fail is to quit. Don't quit before you give it a real try.
- 2. There is no deadline but SET A GOAL for returning your work. Set a goal for when you want to be done. A week? Two weeks? A month? If you're out of practice, give it a month. Plan to tackle one question a day. Maybe two? Stick with it. If you miss it, set a new goal and keep going.
- 3. <u>Spelling, grammar and punctuation don't mean as much as an idea!</u> Ideas count. Good ones, funny ones, original ideas, even bad ones. We won't complain about your spelling or grammar. Don't let spelling get in the way of your opportunity to grow, learn and explore the world with your mind.
- 4. There are so many questions in this unit! I'm overwhelmed! Tackle it one question at a time. Do one question a day. One question every 2 days. Sit for an hour and work on it and then take a break. Or work till it's done. It doesn't matter how you approach getting it done. Just start.
- 5. My handwriting is a mess! Still not a reason to quit or not try. Handwriting needs to be somewhat legible but don't get all caught up in worrying about it and let your messy hand writing stop you. We'll do our best to figure out what you've written and give you feedback on your answers, not your handwriting.
- 6. I'm not sure I understand all the questions. If you shy away from reading and learning something new because learning has been difficult or discouraging in the past, it is important to realize learning does not depend on what grade you completed in school or your past success. Learning depends on your willingness to try something new. It's ok if you're a slow reader be patient with yourself and just keep picking it up. Reading even one sentence at a time. Eventually it'll get easier and easier.
- 7. <u>Can I ask someone for some help?</u> Yes, that is completely ok. Get some help from a friend.



Course Catalogue

Science and Math

Environmental Issues: Learn about processes which occur naturally on Earth and how humans are transforming the environment.

Health: Nurture a positive relationship with your body through endurance, flexibility, strength, nutrition, exercise, and relaxation.

Marine Biology: Explore the beautiful ecosystems under the sea and learn about the creatures who call them home.

Science Sampler: Interested in science but not sure where to start? This course is physics, astronomy, geology, biology, and chemistry all in one!

History and Art

Art of the Masters: Study famous artists and learn about their lives and inspirations.

Fundamentals of Drawing: Learn basic drawing skills with a focus on the fun in fundamentals!

NOTE: this course has limited enrollment so please include a 2nd choice.

World Mythology: Discover creation and underworld myths in five cultures worldwide.

Histories: Go on an adventure through the past! Topics include ancient Egypt, post-WWI America, immigration, revolutions, mail, vaccines, writing, and musicals.

Inventions: Explore technological advancements in our past, present, and future.

Philosophy: Contemplate fascinating thought experiments and explore the major branches of philosophy, or the "love of wisdom.

U.S. Education: Learn about the education system in the United States — where it all began, how it grew, and what it looks like today.



A drawing created by student Paul B.

Writing

Biography: Explore stories about the lives of people both famous and fictional, and create your own autobiography about your life.

Journalism: Study about and write your own late-breaking news stories and editorials.

Creative Language (CL): Immerse yourself with all kinds of writing! Learn about the writing process and write your own pieces.

Completion of Creative Language allows you to join any of the following writing clubs:

Drama Club I & II: Study scenes by famous playwrights then craft your own scenes. *CL required:

Poetry Club I & II Write and critique poetry, including poems by fellow College Guild students! *CL required.

Short Story Club I & II: Study fictional short stories by famous authors and write your own. *CL required.

Culture and Society

Captivities: Examine different kinds of captivity including war, physical disability, injustice, incarceration, and more. **Dogs:** Learn all about "man's best friend" from the evolution of dogs, their intelligence, and their relationship with humans!

Families: Explore what it means to be part of a family and how relationships affect the people in them.

Gardening: Learn how to care for various plants in this course.
Gardening can be a connection to nature, a relaxing hobby, a tool to cultivate food, and so much more!

Religion: Study religion's role in the lives of people from different cultures and faiths.

Sampler: Excited to learn but don't know where to start? Each unit in this course covers a new topic from stars to tornadoes to music!

Travel: Take a mental journey to different corners of the world and learn about local cultures! Regions covered include Maine, France, China, Australia, Peru, and Timbuktu.

What's on Your Mind?: Dig deep in the human mind by exploring basic concepts in various fields of psychology.

- 8. <u>I'm afraid I'll get it all wrong!</u> It's OK to not know an answer. You can simply tell us "I don't know the answer" to any question. That's ok. We know you may not know all the answers. But we love it when you try! So just keep trying! Don't be afraid to guess!
- 9. Certificates of Completion! Finish any course and you'll receive a Certificate of Completion. We think it's really powerful when a student finishes a course. We want you to feel proud of your accomplishment! Share it with someone you care about to show them you are changing. Share it with your case worker or even parole board to show them you are growing and learning. Send it home to your family!

The many incarcerated people who work hard on their College Guild classes find it to be life changing for many reasons. They discover how much fun it is to learn, how powerful it is to get encouragement from someone who doesn't know you and who volunteered to read your work, and starting to see yourself as someone who is more than an incarcerated person.

No matter what you have done or how long you have been or will be in prison, you're not a failure unless failure is what you accept for yourself. In fact, it's impossible to be a failure if you use your time well. One of the greatest dangers that confronts an incarcerated person is not using time in prison consciously and, as a result, getting used by it. That amounts to finding oneself six months, or five years, or twenty years later with an inner life that repeats over and over and over with the same old craving, anxiety, hostility, anger, and self-doubt. By using your time well, you break out of this inner prison. You learn how to "do" your time. You make the most of it.

As one student wrote: "Time is precious. Learn how to do your time. Don't let time run you. Stop. Listen. Hear the knock. If you can't hear it then turn the radio or T.V. off."

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Creative Language Unit 3 of 6

9/8/2023

Randall Morris

Fiction

Creative Writing
Course
Work

Answers

1. Considering that I just lived through the longest and hottest summer on record with no air conditioning, my view of the evening sky is mixed with feelings of gratitude and contempt. After seventy straight days with no rain, no cloud cover, and daily temperatures of well over 100 degrees, any romantic feelings that I might have previously held regarding the evening sky have been permanently scorched away by the cruel Texas sun.

To answer the question, Eliot's sky looks just like mine. However, mine was brutal and, therefore, does not feel the same. I can imagine that his romanticized view and intent was to invoke feelings of nostalgia and regret for the unfolding conclusion of a day that is slipping away and that will never come again. Such sentiments imply that the day was pleasant and that the evening sky should be observed with affectionate reverence. My contempt for it stems from my prolonged and brutal exposure to it in these prison barracks. The gratitude that I mentioned comes from the slight but extremely brief relief that the disappering sun brings.

 Another evening, and here we are, yearning and despising these last moments forward until we can glimpse the stars.
 And yet we still sweat together until the sun's next morning assault.

Come my friend and let us pretend, that as the hot sun sets our misery will end. Even if not we can still have fun, watching the demise of this evening's cruel tyrant sun.

If I were not so angry at the sun right now I could imagine an ending such as: "Like the faint and dimming whisper from the end of a life brightly lived" to describe the evening sun and sky. But invoking such syrup would not satisfy my hostility and need to attack it right now.

I think that it is quite clear that the character is me and that I am speaking to those who have endured this hard summer with me. And right now, I do not like Eliot's invitation because his description is sterile compared to my experience.

3. "Before starting the car, Patricia slipped the Hostess Cup Cakes out of her pocket" only to discover that the tightness of her jeans had popped the packaging and squeezed a mixture of chocolate cake and cream filling inside her pocket. She then realized that in order for her to start her car she would need to reach deep into that same pocket to retrieve her car keys.

"There were 982 chickens in the parking lot - Nancy had counted them all." Then as she turned from her window she counted two ducks, 3 spider monkeys, five cats, one hippopotamus, one diary cow and three peacocks with their plummage spread in full majestic display in her room. Nancy decided to report this at once to the nurses station but as she delicately manuevered her way through this uninvited crowd, she suddenly froze with the memory of what Dr. Hilterman did the last time she brought her observations to their attention!

- "For some reason, the ocean reminded her of Aunt Middy's orange apron" which confused her because the ocean is not orange and Aunt Middy lives in Toadsuck, Arkansas.
- "George knew it was going to be a tough day on the job." But "that's ok", he thought as he affixed extra pieces of flair to his company shirt and suspenders. Becoming THE manager at Cracker Barrel had been a long time in coming and, by God, he was going to rise to the moment.
- "He dropped the mouse on the front porch and that's when he saw it." The front door stood slightly ajar and Max, the in-resident rottweiler, was glaring at him. Pasha's back instinctively arched and his fur spiked as he spit out a sharp hiss.
- "Well, said Stanley, "I'll never try that again." Stanley often made mistakes which were usually preceded with, "Hey, hold my beer and watch this!"
- "Mary watched the airplane with her boyfriend and luggage take off." Her new flight would leave in four hours but it was a small price to pay for the \$500 credit voucher the airline had given her for her seat on the overbooked flight.
- "The magician pulled a rabbit out of his sleeve, and what happened next surprised even <a href="him!" A group of PETA activists burst through the auditorium doors dressed in fake rabbit fur drenched in red paint chanting, "Stop abusing rabbits!"
- 4. I had already made paragraphs with a couple of the above and especially the one about the "982 chickens". Don't get me wrong. They were fun but I am ready to move on now. :-)
- 5. As I have said in the other units, I absolutely hate writing fiction. And after looking at the list of characters that this exercise wants me to use to cobble together a piece of drivel, I am tempted to abandon the course altogether.
 - [All of the above was written in September, 2023. I stopped there because exercise #5 was so daunting, I didn't want to continue. I'm not kidding in my loathing of fiction. And then I peeked ahead and saw exercise #6 and that did it. I abandoned this unit. From time to time, my mind would revisit #5 and #6 and I drew blanks every time. But then on 12/30/2023, a low watt light bulb went off above my head and I saw a glimpse of how I might satisfy #5 & #6 enough to get this fiction crap behind me. Below is my solution to #5]

Please see the attached "Fiction (a true story)" in answer to #5.

- 6. Please see the attached "Let's Not Play 'Pretend' (Technically, a fairy tale fiction)"
- 7. This one is easy as I will never write a novel or anything else of fiction! Fiction is not entertaining and there are plenty of real life characters who live and have lived in poverty so one does not need Charles Dickens to provide these characters (responding to your example).

If I have to do this I will call this novel "A Novel Novel". The characters will be me and a group of like-minded friends who embark to rid the world of fiction. The location will start in this prison and then spread to other parts of the country as we each gain release from prison. From there it will spread throughout the world. An unexpected twist will be that we will infiltrate Momis For Liberty and slowly groom them to direct all of their Republican agenda school book banning efforts to just banning all works of fiction except "A Novel Novel" which will continue into perpetuity as a manifesto against fiction. (That answer also takes care of #8)

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9. The paragraph that I am choosing will be at a point in A Novel Novel when 1, Randy, as the main character, have already infiltrated the most militant Florida chapter of Moms For Liberty and am just sitting down at a scheduled round table meeting where they will be rabidly compiling a new target list of Leftist Woke agenda books that are suspected of containing affirmations that encourage gay, bi, trans, drag, clown, omni, pan, poly, nonbinary, linear, obtuse, obsequious, and perpendicular behaviors in elementary school students and faculty (but not between the two).

The whole point of the plot is that the main character is able to manipulate and whip these ultra-right wing conservative MILBs (Moms I'd Like to Ban) into a Gestapoesque banning frenzy and groom them into focusing their spittle at <u>ALL FICTION</u> books by convincing them that the majority of the smut and depravity is being peddled through fiction, i.e., 50 Shades of Gray, Amish themed romance novels, etc.

I would create the characters of the Moms For Liberty committee in a way as to make them look batshit nutty and maniacal and assign them conservative prudish names like Becky, Barbara, Jenny, etc. And in order to persuade them to take my advice and to change their tactics I would interlace my dialogue with plenty of references to contemporary news articles that have recently made them look like wackos. For example, it was recently reported that MFL had recommended a book to be banned from a school library in Florida where the only reference to sex or sexual orientation was the author's last name ("Gay"). I would also bring up the example of the late Rev. Jerry Falwell's social suicide through his famously bizarre and public rant and attempted ban of one of the Telle-Tubbies (Tinky Winky) because Falwell was convinced that the character was promoting gayness to children. And in an even more bizarre twist, Falwell did this against the sound advice of his good friend, Larry Flynt, the late smut merchant owner and editor of the pornographic magazine, Hustler! (I promise that I am not making this up. Just Google: "Larry Flynt and Jerry Falwell on Larry King") Given the inclusion of these facts, my novel could be categorized as Historical Fiction and it would be a snarky comedy if you have not noticed. It's creation would only serve to advance my personal hatred and crusade against fiction.

Excerpt from A Novel Novel

(At the Duval County Florida chapter of Moms For Liberty book banning strategy meeting)

Becky (MFL's Chapter ChairMom): Good morning, ladies. Randy here, has joined our chapter as a strategic advisor and brings with him highly specialized censorship experience as he served a term in federal prison and was subjected to the exact kind of ruthless censorship and control that we hold dear!

[Disturbingly emotional and enthusiastic group applause]

Randy: Hello and thank you for that Munich-style welcome. I would like to start off by addressing the most recent negative press that is hurting your efforts and creating public push back. I am referring MFL's recent pressure on the Duval County School District to remove a book from the school library that was written by the author known as Gay.

Becky: Ummm, we don't tolerate gay authors or gay agendas!

Randy: Yeah, well, not gay. She's not gay. I mean her name is Gay. Er, but not meaning in a gay way. It's just that the letters are G-A-Y. It's her name for God's sake!

Becky: That word, whether it is a name or not, is featured on the front and spine of the book so it is channeling the choice to our kids to be gay and that is not ok.

Randy: Look ladies, I applaud your decision to be straight and I am sure that it was a difficult **choice** with all of the books tempting you to change your minds but I would like to introduce the idea that there is a more efficient way

to accomplish your censorship goals and get all of these books banned. The answer is, ... ban all fiction! What was 50 Shades of Gray? Fiction! Brave New World? Fiction! Practically all of this filfth is being introduced through popular fiction. Ban all fiction and you severely impede this evil that is poisoning the kids.

- 10. My book ends with all fiction banned and the world directing its collective attention to real stories of real people, real animals, real problems, real achievments, and real education.
- 11. The author's picture will be of me wearing Groucho Marx glasses with the bushy eyebrows and fake nose due to the death threats from fiction lover fanatics. The pic will be a snarky pose of defiant, non-negotiable obstinacy but with a Vidal Sassoon quality and hue to it.

Back Cover Summary

"In this quirky novel of manipulation and betrayal, Randy **Real** casts himself as a federal prisoner who gains his freedom and joins Moms For Liberty under the pretense of helping in their zealous and sometimes nutty missions to erradicate books containing messages that they oppose from school libraries. But by the time MFL discovers the **REAL** reason for his assistance, it's too late!"

Back Cover Reviewer Quote

"Renowned hater and anti-fiction crusader, Randy Real, breaks with his tradition and publishes his first novel, A Novel Novel, and this comes after he had once famously proclaimed that he would willingly undergo a hysterectomy before he would ever write one word of fiction. But after only a few chapters, his intent becomes quite clear as you realize that he has cleverly cloaked his vehement hate for fiction in sheeps' clothing. It's a Trojan Horse and, frankly, I hope that he dies screaming!" -Sandra Fischbein, NY Times/Literary Fiction Review

12. This assignment is worded in such a way that presumes that each author had made me relate to the subject and that "[each] piece [was] enjoyable to read."

To the contrary. Besides fiction, I hate poetry, reading/writing/talking about cars and sports AND I am not sure of anyone who enjoys reading about someone that prattles on about their health issues and infirmities. We are all circling the drain and deteriorating as we go round and round. Yeah, all five of those excerpts related to me in that they all sucked to the point that I almost slipped into a merciful coma from boredom while reading them. I mean, really? The first one was perfect because it set the pace and drastically lowered the expectations. When you call an old aunt, you expect them to tell you every minute detail of their health issues which most people listen to and tolerate out of respect and because they have to. But, I am not going to seek out such reading material when I have a choice. Uhg! The elipsis at the end of that one (from Danny) alluded to the possibility that you had at least spared us from learning about his periods of incontinence and erectile dysfunction so, thanks for that.

- 13. None of them were my favorite and they all sucked equally in their own miserable way.
- 14. See my fictional news report titled "France Surrenders! (Again)" (attached)
- 15. I assume that this question is referring to the fiction from #14. I would hope that most would find it humorous but in the end, who cares? It's worthless fiction. If I must write fiction I will at least make it funny to me!

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16. A young group of kids discover an abandoned and dilapidated antebellum house in some Mississippi woods while exploring for new fishing spots on a river. While exploring the house, they discover a diary of a boy who lived during the civil war. They also discover a rustic tombstone in a small family cemetary near the house. After clearing away some overgrowth of brush and weeds, they find the name of the diary's author.

They come back to the house several times and decide to camp there one night where they build a camp fire and take turns reading passages from the diary out loud as the movie plays out some of the diary and switches back and forth between the contemporary characters and the boy from the past.

Many things could be built into this skeleton, i.e., revelations of a secret or a valuable object that the boys could find through the revelations of the diary. Or, a horrible or amazing secret could be revealed that would cause a scandal or shock to someone living today in their town. Etc., etc.

Or, the diary could reveal an old crime that the boys could prove using the diary to unearth old evidence.

17. Mountain Climber: Another day, another mountain. I don't know why I do this. Always climbing but once I am on top, there is only one way to go... back down to where I started. Then, I do it all over again. It's like the insane cycles of drug addiction. One is never enough. Why can't I fill this bottomless hole in my soul?!

Teacher: I can't believe that they fired me today! Me! After putting up with these brats year after year for little pay you would think that I would have earned some consideration and appreciation. It had to be said. Moms For Liberty went too far in getting all of our fiction books removed from our school library and all I said was that if you are going to remove all of the fiction, you have to remove all of the religious books, too.

Sorry guys, but I can't do any more fiction. Especially with diary prompts for an "ice cube" and a "cloud". I'm just not this kind of writer and don't want to be one and never will be one. In fact, if I had tried to fulfill those last two diary prompts, I would have had to abandon it due to writer's block just as I had done with #5 and #6 for months. I do not and cannot write about inanimate objects doing anything other than than what they do, which is nothing. They don't talk, they don't have personalities and I am not the guy to invent them as I am way too linear for that.

Writer: (This is not a fictional entry) OMG! I am so glad to have finally finished the fiction unit of my writing course. It took me over 4 months to do it but now it's done. This exercise has strengthened my hate for fiction but with it now behind me, my only concern is that a unit on poetry might be foisted on me next. If so, I'm outta here.

18. Because you have more control and options in telling the story.

Randall Morris

1/5/2024

FCI-Seagoville, Texas

Fiction (A True Story)

Once upon a time, there was an aspiring writer who absolutely hated fiction. He despised reading it, writing it, hearing it, and watching it. His loathing for fiction was so great and complete that he could not tolerate fictional television shows and movies or even to listen to people recount their nightly dreams. In short, he was only interested in real experiences and he only wanted to become a better writer of real stories about real things.

"Ahhhh!" exhaled Randy as he excitedly read the small advertisement offering free creative writing correspondence courses from the College Guild. "That's what I'm going to do to improve my writing ability," he muttered to himself with a smile as he placed the postage stamp onto the envelope containing his completed writing course application. But after sliding the envelope into the outgoing mail slot and hearing the soft puffy thud confirming that his envelope had found its place on top of the other outgoing mail deep inside the mailbox, he felt a sudden shudder of dread with the realization that the writing course might require him to produce poetry and, worse yet,... fiction! "Oh god, I hope not," he winced as he turned and shuffled back down the hall to his room.

A month later, Randy received the first course unit and promptly completed and mailed it back for review. After another month, the second course unit arrived and, like with the first one, Randy diligently completed it and after placing it into the mail back to the College Guild, Randy relaxed and smiled thinking, "So far, so good. I am really enjoying these writing assignments."

A few weeks later, Randy received a packet from the College Guild containing favorable reviews of his work as well as the third unit of course material to be completed and returned. As Randy leafed through the new course work he was immediately struck dumb. There it was, his worst fear:

"Write a short story which includes at least three characters from six stories/ fairy tales below. (You don't need to be familiar with the fairy tales themselves - use your imagination from the brief descriptions beside each character)"

These instructions droned on to list and describe Robinson Crusoe, The Little Prince, Wilbur (a talking pig in Charlotte's Web), Little Red Riding Hood, Rapunzell and Sleeping Beauty.

"Whyyyyyy?!" cried Randy. "This is absolute torture!" At this point, Randy imagined that if, in the end, he were to be amongst those that are unfortunate enough to be barred entry to the pearly gates and damned to biblical Hell, it will most certainly be a classroom where he will be required to create fiction for eternity.

Randy agonized over this list of fairy tale characters for several days as he desperately tried to craft a casual and coherent connection that could be plausibly made between them but he repeatedly came up with nothing. "Maybe I'm too linear for this," he thought. "I mean, what am I supposed to do with a talking pig for god's sake? And even if I somehow manage to form some connection between them, what would the plot and conclusion of the story possibly be?" he whined. "Never mind!" he shouted out of exasperation. "I'm getting a freakin' brain cramp over this ridiculous assignment," he grumbled as he threw his writing course assignment onto a shelf where it would stay collecting dust for the next four months without any further progress or ideas of how to develop it forward. "It's so much easier to write about why I hate fiction than to write fiction," he mused in defeat.

But then one day a low watt light bulb appeared and began to pulse and buzz above Randy's head as he began to slowly imagine a way out of this paralyzing dilemma. "This doesn't have to be so difficult," he thought with a glimmer of clarity. And the more that he thought about it the more he realized that he is in control of the narrative no matter if he hates the narrative or not. So in a hasty attempt to capture the creativity that was beginning to unfold in his head, he quickly loaded a blank page around the spool of his prison typewriter and loudly declared, "On this blank page I am the Alpha and the Omega! I am omnipotent and omnipresent!" But despite the silliness of the words, or perhaps maybe even because of that silliness, Randy sensed the beginnings of some control over the writer's block that had been plaguing him for months and preventing him from finishing the course.

Instead of beginning the story with all of these characters and having them interact with each other, he came up with the idea to use his "creator" powers to create the first character and have that character interact with the creator because that would feel more natural and allow Randy to use his own personality in the story which is another way of saying; it's freakin' easier to write the story this way. He then could use that dialogue to introduce the remaining characters in order to swiftly move the thin plot forward before bringing this excruciating exercise to an abrupt and merciful finish. "Yeah, that's it. Let's do this!" he triumphantly whispered with a long awaited sense of relief.

In the beginning, I created a small island in the Pacific Ocean and although it will serve only a temporary and stupid purpose, it was good. And while I was marvelling at how easy it was to create it, it occurred to me that I really want to get this story over with so I created Robinson Crusoe, hereinafter known as Rob, and placed him on that island.

"Are you there, Rob?"

"Yes, Creator, I am here. What do you want with me and why am I here?"

"Well, Rob, you are here because I have to create a fictional story and need some help to create it. So, I created you to help me do that. And please, call me Randy. 'Creator' might be a bit too analogous with the main character and plot of a much older and famous fictional literary work."

"So, what you are saying is that I am not real?" asked Rob. "That's exactly what I'm saying, Rob," answered Randy with a sigh and obvious distaste for the task. "Well, if I and this story are not real, then, what is the point?" pleaded Rob and to which Randy tersely responded, "Exactly."

"So, Rob, to start this story I am introducing you as a lonely castaway in tattered clothes and severely emaciated from hunger." "What?!" cried Rob, "Are you a sadist? Why do I have to be starving?" "Because it is central to what ultimately happens to you in this story," responded Randy with a little impatience. "Oh my god, are you planning to kill me off because that's what this sounds like," cried Rob with increasing distress. "Actually, I will be sacrificing one of the other characters so that you will survive and besides, even if you did die, it's not a big deal because you aren't real in the first place, Rob." "Holy crap, are you contemplating cannibalism? If so, I'm out. I won't do it." "Relax," consoled Randy, "I have no plans for you to resort to cannibalism, Rob, trust me." "Well, then please hurry up 'cause I'm literally starving."

"Alright, now I will need to introduce two additional fairy tale characters in order to move this along quickly. Are you with me. Rob?" "Sure, but why are you moving this along so fast?" asked Rob suspiciously, "It sounds like you really don't want to create this

story and that your heart isn't really in it." "You are very observant and absolutely right, Rob," confessed Randy. "The truth is that there is no reality in fiction and I hate it. However, I am under duress and being compelled by the College Guild to produce this crap so, work with me, Rob, ok? I mean, to be frank, I would rather use laxatives irresponsibly than to have to do this." "That bad, huh?" sympathized Rob. "Tell me what I need to do, Chief."

"Thanks, Rob. Just try to stay open minded and go with the flow."

"The next character I will create and put on this island is Little Red Riding Hood!" declared Randy with a ridiculously exaggerated stentorian voice. "Ho..ho..hold on there, Chief," protested Rob. "You have me lonely, half naked, and starving on this island and you are sending me a little girl? I might be fictitious but I'll bet that I have some rights enshrined in some Writer's Guild somewhere." Randy gave this some thought and offered, "How about Little Red Riding Hood all grown up?" "That's better but do it quickly please so that we can get to the part where we finally eat," whined Rob.

And in an instant, Randy created Big Red Riding Hood and she was perfect but suffering from hunger. "Hello and good that you are joining us, Red," welcomed Randy. "What the hell is going on here and why is this miserable bum standing here leering at me? I'm so creeped out. And why am I suddenly so hungry?!" "That's a long story, Red, but to move this along I am inviting you both to a feast of BBQ pork this evening on the beach - Kona style," replied Randy with a flare of showmanship to the jubilant cries of anticipated relief from Rob and Red.

So, that evening the two invitees positioned themselves around the campfire opposite each other on the beach and undignifiably tore into the mounds of steaming BBQ pork that had been served to them and as they greedily ate, Randy announced, "For creative writing course technical reasons, I must now reveal to you that you are enjoying the slow roasted remnants of Wilbur from Charlotte's Web," as Randy motioned towards their respective plates of steaming pork. Red immediately lept up and screamed, "Are you serious?! I know that character and he was one of my favorites! How could you?!"

Rob looked up with a mouth full of pork and with the pork fat glistening with the reflection of the campfire on his lips mumbled, "What character?" to which Red shouted through her tears and snot bubbles, "Wilbur, the talking pig from Charlotte's Web!" Rob shrugged his shoulders and thoughtfully replied, "Well, he is a very good character. Very tasty," before turning his attention back to finishing his plate.

And it is there that we leave Rob, Red, and the slow roasted remains of Wilbur as we zoom out from the island until it is nothing more than a miniscule speck in the vastness of the blue Pacific. You may be asking yourself, "What the hell was that? That wasn't a story," and that's ok because I am not and never will be the supplier of drivel that the masses use and abuse to mindlessly divert their attention from their miserable lives by blocking out the reality and concentrating on the useless and artificial in a never endquest for entertainment to stave off the boredom that endlessly and relentlessly creeps in because they do not have a relationship with themselves and so, therefore, need the constant distraction. Do I really hate fiction? I do. Am I aware that that was a run-on sentence? I am.

So, in conclusion, my story was a waste of time and your time and the particulars of my story do not matter because... It's Not Real. And, you are now poorer and dumber for having wasted your time reading it.

12/30/2023

Randall Morris FCI-Seagoville, Texas

Let's Not Play "Pretend"

(A fairy tale but only technically)
(With a hint of fiction)

This fairy tale was created under duress by a guy who hates fiction. But this is not a surprise to the folks at the College Guild who are requiring me to write this nonsense in order to obtain a certificate in creative writing as I have expressed this loathing rather creatively in much of my previously submitted course work.

Fiction! Why fiction? Why does it require fiction to demonstrate writing skills? There are plenty of real topics and real people to write about without having to resort to making things up. It's the same with soap operas in that real life and people create quite enough real drama without having to develop synthetics.

In case that did not resonate, how about this; there was a time in the recent past when half the planet was glued to their smart dumb phones playing a game that required them to spend hours upon hours caring for and feeding virtual farm animals. These idiots would engage in endless rounds of feeding, grooming, and caring for pixels in order to prevent the software algorithm from killing their virtual animals which was ironic because actual animals and pets suffered from physical, mental, and emotional neglect while their owners stared at their phones for months. Worse yet, there were millions of deserving animals shivering in animal shelters that could have used some of that attention. Pffft.

So, given my contempt for fiction, it should not be a surprise that I, as a man, would rather be diagnosed with Wandering Uterus Syndrome than to be required to "Make up an original fairy tale in which all the characters are pieces of furniture, one in which all are clothes, or one in which all are food" in order to get my certificate for the course. Fiction should be an elective as it is not the only benchmark for determining creative writing abilities. But if you insist on it, at least leave it open ended for the student to create that which best fits to and interests the student. (Pieces of furniture? Really?)

However, in a good faith effort to satisfy this requirement, I sat down in my room with an open mind and looked at the individual pieces of my furniture and imagined what they would say to each other if they could. I even tossed out some inviting discussion prompts to spark an imaginary conversation and to help my furniture overcome any shyness that might exist. In the end, I'm sad to report that my furniture did not inspire any imaginary dialogue or imagery of it doing anything other than it stoically fulfilling the utilitarian purpose for which it was made. And as there is no reason to believe that the result would be any different with my clothes or food, it was purely a consideration of efficiency not to repeat the exercise.

Now, if I am honest, I really didn't do all of that silliness with my furniture so what I just wrote is a complete and fabricated lie. So, there! There's your fairy tale fiction! And I hope that it was worth the time that you cannot get back after reading it because you are no more enriched than when you started.

And that's all that you are going to get from me on this assignment because I'm shutting this story down with the efficiency of a guillotine.

12/31/2023

Randall Morris

FCI-Seagoville, Texas